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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

ENVIRONMENTAL PROTECTION)	Case No. 3:22-cv-03520-TLT
INFORMATION CENTER, et al.,)	
Plaintiffs,)	DECLARATION OF PETER
vs.)	M. K. FROST IN SUPPORT OF
ALECIA VAN ATTA, et al.,)	PLAINTIFFS' MOTION FOR
Defendants.)	ATTORNEYS' FEES, COSTS,
)	AND OTHER EXPENSES
)	

1 I, Peter M. K. Frost, hereby declare:

2 1. I am an attorney of record in this case and represent Plaintiffs.

3 2. I was born in Princeton, New Jersey; I was raised in Oregon; I obtained an A.B. from
4 Stanford University in 1983 and a J.D. from the University of Oregon School of Law in 1990.
5 Between college and law school I served as a Peace Corps volunteer in the Philippines, played
6 rugby in Hong Kong, and volunteered for an Oregon land conservation advocacy group.

7 3. After receiving my law degree, from 1990-1992, I was a law clerk to Hon. Jonathan U.
8 Newman and Hon. Robert D. Durham at the Oregon Court of Appeals in Salem, Oregon.

9 4. From 1992 to 1999, I was a staff attorney with the National Wildlife Federation in its
10 western regional office in Portland, Oregon. While there I represented clients in federal
11 environmental cases involving the Wild and Scenic Rivers Act, the Endangered Species Act, the
12 Clean Water Act, the National Environmental Policy Act, and other federal laws.

13 5. From 1996 to 1999, I was an adjunct professor of law at the Lewis and Clark Law
14 School, and taught a weekly clinical course on federal environmental litigation.

15 6. In 1999, I joined the Western Environmental Law Center in Eugene, Oregon as a litigator
16 and firm manager. In 2001, I transitioned to full-time litigator, which I have been since then.

17 7. From 2004 to 2007, I coached the Environmental Moot Court team at the University of
18 Oregon School of Law to prepare for and compete in the National Environmental Law Moot
19 Court competition at Pace University in White Plains, New York.

20 8. Since 2010, I have taught the Environmental Law Clinic at the University of Oregon
21 School of Law. The clinic is comprised of eight students in each of two semesters annually.

22 9. I have been counsel in numerous federal appellate cases, including:

23 *San Luis Obispo Coastkeeper v. County of San Luis Obispo*, No. 24-7807 (pending 9th Cir.
24 (2025)) (lead amicus curiae law school faculty supporting affirmance on bases of proven ESA
25 take and lawful mandatory preliminary injunction).

26 *Environmental Protection Information Center v. Van Atta*, No. 28-1813, 2025 WL 470894 (9th
27 Cir. Feb. 12, 2025) (lead-concede lack of appellate standing based on agency implementation of
28 permits).

WildEarth Guardians v. U.S. Forest Service, No. 23-35352, 2024 WL 3042396 (Ninth Cir. June
18, 2024) (co-counsel, loss as to federal agency action under ESA Section 7).

1 *California State Water Resources Board v. Federal Energy Regulatory Commission*, 43 F.4th
2 920 (9th Cir. 2022) (co-chair of petitioners' successful challenge to FERC order that State
3 waived authority under CWA Section 401 to condition hydroproject license).

4 *Brookfield White Pine Hydro LLC v. Federal Energy Regulatory Commission*, No. 23-1075,
5 2024 WL 3311809 (D.C. Cir. 2024) (co-chair of petitioners' successful defense of FERC order
6 that State did not waive authority under CWA Section 401 to condition).

7 *In Re Clean Water Act Rulemaking*, 60 F.4th 583 (9th Cir. 2023) (co-chair as appellees in
8 challenge to Clean Water Act Section 401 rule).

9 *Bohmker v. State of Oregon*, 903 F.3d 1029 (9th Cir. 2018), *cert. denied* (2019) (lead as
10 intervenor in successful defense of state regulation on federal preemption challenge).

11 *WildEarth Guardians v. Conner*, No. 17-1334 (10th Cir. 2018) (second chair as appellant in
12 unsuccessful challenge to agency timber sale).

13 *Klamath-Siskiyou Wildlands Ctr. v. MacWhorter*, 797 F.3d 645 (9th Cir. 2015) (second chair as
14 appellant in successful defense of sufficiency of ESA notice).

15 *Conservation Northwest v. Sherman*, 715 F.3d 1181 (9th Cir. 2013) (lead as appellee in
16 unsuccessful defense of consent decree).

17 *Wilderness Watch v. U.S. Fish & Wildlife Service*, 629 F.3d 1024 (9th Cir. 2010) (lead in
18 appellants' successful challenge to federal agency water developments in wilderness).

19 *Citizens for Better Forestry v. U.S. Dept. of Agric.*, 567 F.3d 1128 (9th Cir. 2009) (lead in
20 appellees' successful challenge to NFMA regulations).

21 *Siskiyou Reg'l Educ. Project v. U.S. Forest Service*, 565 F.3d 545 (9th Cir. 2009) (lead in
22 appellants' successful challenge to instream mining permits).

23 *Ventana Wilderness Alliance v. Bradford*, 313 Fed. Appx. 944 (9th Cir. 2008) (lead in
24 appellants' unsuccessful challenge to livestock grazing in national forest).

25 *Friends of Yosemite Valley v. Kempthorne*, 520 F.3d 1024 (9th Cir. 2008) (lead in amicus curiae
26 successful defense of challenge to national park management plan).

27 *Aylward v. U.S. Forest Serv.*, No. 03-35856 (9th Cir. 2005) (lead in appellees' successful defense
28 of challenge to limits on mining in streams).

High Sierra Hikers v. Blackwell, 309 F.3d 630 (9th Cir. 2004) (lead in appellees' successful
challenge to commercial packstock services in wilderness).

Friends of Yosemite Valley v. Norton, 348 F.3d 789 (9th Cir. 2003) (second chair in successful
challenge to first iteration national park management plan).

1 *Center for Biological Diversity v. Delgado*, 61 Fed. Appx. (9th Cir. April 4, 2003) (lead in
appellants' unsuccessful challenge to wild and scenic river management plan).

2 *Or. Natural Res. Council v. Harrell*, 52 F.3d 1499 (9th Cir. 1995) (lead in amicus curiae
3 unsuccessful challenge to dam on river).

4 *U.S. Dept. of Commerce v. F.E.R.C.*, 36 F.3d 893 (9th Cir. 1994) (lead in appellants' successful
5 challenge to failure to require FERC license for hydroproject).

6 10. I have been counsel in numerous federal environmental cases in district court, including:

7 *WildEarth Guardians v. U.S. Fish and Wildlife Service*, 342 F.Supp.2d 1047 (D. Mt. 2018)
8 (granting summary judgment that incidental take statement violated ESA).

9 *Double R Ranch Trust v. Nedd*, 2018 WL 466652 (D. D.C. Jan. 18, 2018) (lead in intervention to
file successful motion to dismiss the plaintiffs' case for lack of standing).

10 *Center for Biological Diversity v. C.L. "Butch" Otter*, 2018 WL 539329 (D. Id. Jan. 24, 2018)
11 (lead in granting motion for reconsideration and reversing prior summary judgment holding that
12 state of Idaho liable for take of lynx).

13 *Flyfishers v. McIntosh*, 2015 WL 1176853 (D. Or. March 13, 2015) (lead in denying summary
judgment that state of Oregon liable for jeopardizing Chinook salmon).

14 *Native Fish Soc'y v. National Marine Fisheries Serv.*, 992 F.Supp.2d 1095 (D. Or. 2014) (lead in
15 granting summary judgment that agency liable for take of various salmon).

16 *Cascadia Wildlands v. Bureau of Land Mgmt.*, 2012 WL 6738275 (D. Or. Dec. 21, 2012) (co-
17 chair in granting summary judgment that timber sale violated FLPMA).

18 *Wilderness Watch v. Iwamoto*, 853 F.Supp.2d 1063 (W.D. Wash. 2012) (lead in granting
summary judgment that reconstructing fire lookout in wilderness violated Wilderness Act).

19 *Californians for Alternatives to Toxics v. U.S. Fish and Wildlife Service*, 814 F.Supp.2d 992
20 (E.D. Cal. 2011) (lead in granting summary judgment preventing use of rotenone in wilderness
21 stream).

22 *Conservation Northwest v. Rey*, 674 F.Supp.2d 1232 (W.D. Wash. 2009) (lead in granting
summary judgment that agencies unlawfully withdrew protective forest plan standard).

23 *Citizens for Better Forestry v. U.S. Dep't of Agric.*, 632 F.Supp.2d 968 (N.D. Cal. 2009) (lead in
24 granting summary judgment that revisions to NFMA regulations must undergo NEPA analysis
and ESA consultation).

25 *High Sierra Hikers Ass'n v. Weingardt*, 521 F.Supp.2d 1065 (N.D. Cal. 2007) (lead in granting
26 summary judgment that wilderness plan allowed unnecessary commercial packstock operations).
27
28

1 *Citizens for Better Forestry v. USDA*, 497 F.Supp.2d 1062 (N.D. Cal. 2007) (lead in granting
2 summary judgment that revisions to NFMA regulations must undergo NEPA analysis and ESA
consultation).

3 *High Sierra Hikers Ass'n v. U.S. Forest Serv.*, 436 F.Supp.2d 1117 (E.D. Cal. 2006) (lead in
4 granting summary judgment that agency cannot reconstruct dams in wilderness).

5 *Or. Natural Res. Council v. U.S. Forest Serv.*, 445 F.Supp.2d 1211 (D. Or. 2006) (lead in
6 granting summary judgment that Forest Service timber sales violate NEPA).

7 *Californians for Alternatives to Toxics v. Troyer*, 2005 WL 2105343 (E.D. Cal. Aug. 31, 2005)
(lead in granting TRO preventing use of rotenone in stream in wilderness).

8 *Northwest Ecosystem Alliance v. Rey*, 380 F.Supp.2d 1175 (W.D. Wash. 2005) (lead in granting
9 summary judgment that forest management plan amendment violated NEPA).

10 *Env'tl. Prot. Info. Ctr. v. Blackwell*, 389 F.Supp.2d 1174 (N.D. Cal. 2004) (second chair in
11 granting summary judgment that Forest Service timber sale violated NEPA and NFMA).

12 *Or. Natural Res. Council v. U.S. Forest Serv.*, 293 F.Supp.2d 1200 (D. Or. 2003) (lead in
granting summary judgment that six Forest Service timber sales violated NEPA).

13 *Ozark Soc'y v. Melcher*, 284 F.Supp.2d 810 (E.D. Ark. 2003) (co-chair dismissing as moot
14 challenge to withdraw permit to build a dam, after agency withdrew it).

15 *Or. Natural Res. Council v. Forsgren*, 252 F.Supp.2d 1088 (D. Or. 2003) (co-chair in granting
16 summary judgment that Forest Service timber sales violated standards for lynx).

17 *Riverhawks v. Zepeda*, 228 F.Supp.2d 1173 (D. Or. 2002) (co-chair in ruling that Forest Service
violated NEPA in allowing commercial jetboat uses).

18 *Nat'l Wildlife Fed'n v. Cosgriffe*, 21 F.Supp.2d 1211 (D. Or. 1998) (lead in ruling that agency
19 violated Wild and Scenic Rivers Act in failing to prepare river management plan).

20 *Or. Natural Desert Ass'n v. Green*, 953 F. Supp. 1133 (D. Or. 1997) (lead in ruling that BLM
21 violated WSRA when it authorized cattle grazing along wild and scenic river).

22 *City of Klamath Falls v. Babbitt*, 947 F. Supp. 1 (D. D.C. 1996) (co-chair in ruling state
23 designation of river under WSRA precluded FERC licensing of hydroelectric facility).

24 *Nat'l Wildlife Fed'n v. Agpaoa*, 95-3005-CO (D. Or. 1996) (lead in granting summary judgment
that suction dredge mining operations violated Forest Plan provisions).

25 *Idaho Wildlife Fed'n v. Richmond*, 94-1347-AS (D. Or. 1993) (lead in denying summary
26 judgment that Forest Service violated NEPA by authorizing grazing in bighorn habitat).

27 11. In 2025, I was appointed to Attorney/Judge Merit Selection Panel to Recommend
28 Magistrate Judge Candidates for the U.S. District Court, District of Oregon (Eugene Division).

12. In 2000, I was given the David Brower Lifetime Achievement Award for Litigation. It is special to me because I was lucky as an undergraduate to take a course taught by Mr. Brower, and to spend time with him in California and in Oregon.

13. In 2025, I was given the Svitlana Kravchenko Memorial Award for Working to Advance Young Lawyers. I am proud of this award because I try to help law students and young attorneys do the best they can in their legal work.

14. At the request of the Oregon State Bar, I wrote a chapter entitled “The Wild and Scenic Rivers Act,” Environmental Law Deskbook, Oregon State Bar (2008 ed.). I have subsequently updated the deskbook chapter.

15. At the request of a law professor at Lewis and Clark Law School, I wrote and published “Preserving Flows in Wild and Scenic Rivers,” 29 Idaho Law Review 313 (1992). The Idaho Supreme Court cited the article in *Potlach Corp. v. U.S.A.*, 12 P.3d 1256 (Id. 2000).

16. I have presented at conferences for attorneys and law students including “The Wilderness Act at 50,” Wilderness Conference, Lewis and Clark Law School (April 11, 2014), and “The Wilderness Act,” Uncommon Dialogue Series, Stanford Law School (Feb. 22-23, 2012).

17. I have created, led, and/or participated in discussion panels for attorneys and law students that qualify as Continuing Legal Education seminars on federal environmental issues including the Endangered Species Act, the National Environmental Policy Act, the National Forest Management Act, the Wilderness Act, the Wild and Scenic Rivers Act, and Tribal Sovereignty.

18. I am particularly interested in advancing tribal conservation efforts, and have had the honor of representing or working alongside in court the Nez Perce Tribe (in Idaho), the Puyallup Tribe of Indians (in Washington), the Karuk Tribe (in California), the Confederated Tribes of the Grand Ronde (in Oregon), and the Yurok Tribe (in California). I am currently retained by the Cowlitz Indian Tribe (in Washington) to represent it to restore wild salmon on its ancestral lands.

19. To determine reasonable market value hourly rates for federal environmental cases in the forum of San Francisco, I conferred with two attorneys who work for private law firms, and one attorney who works for a non-profit public interest law firm, all of whom handle federal environmental cases in the forum of San Francisco. However, I alone determined my reasonable

1 rates, based on these conferrals, and other sources, such as court orders. I seek hourly rates of
2 \$835 in 2021, \$850 in 2022, \$865 in 2023, \$880 in 2024, and \$895 in 2025, for my work in this
3 case. In my estimation, these hourly rates are less than market value for an attorney of my skills
4 and experience.

5 20. I attach to this declaration as Exhibit A my time sheets in this case. I enter my time often
6 immediately after completing a discrete task, or on an hourly or at least daily basis. I do so in 6-
7 minute increments, so a task denoted as “.1” means I worked six minutes or less on it. I exercised
8 billing judgment and omitted time in this case that would or might be improper to bill a client
9 for. I seek a total of 569.80 hours for my work in this case.

10 21. I attach to this declaration as Exhibit B: *Vaquero Energy Inc. v. County of Kern*, BCV-
11 15-101645, Ruling on Petitioners’ Motions for Attorneys’ Fees (Cal. Super. Ct. Kern Co. March
12 6, 2025). I attach to this declaration as Exhibit C: *Vaquero Energy Inc. v. County of Kern*, BCV-
13 15-101645, Order Granting in Part Petitioner V Lions Farming LLC’s Motion for Attorneys’
14 Fees and Expenses (Cal. Super. Ct. Kern Co. April 3, 2025).

15 22. I attach to this declaration as Exhibit D the 2017 National Law Journal Billing Report
16 listing hourly billing rates among law firms in fora including San Francisco.

17 23. I attach to this declaration as Exhibit E an itemization of Plaintiffs’ compensable costs
18 and other expenses in this case.

19 24. On April 18, 2025, I emailed counsel Erika Furlong, Hannah O’Keefe, and Young Kang
20 of the U.S. Department of Justice to confer related to Plaintiffs’ motion for attorneys’ fees, costs,
21 and other expenses. On April 21, 2025, Ms. Furlong responded to me, and I responded to her. On
22 behalf of our clients, we were unable to resolve our differences as to the motion, but agreed that
23 would Plaintiffs and Defendants would file a joint motion to stay proceedings on the fees motion
24 in order to enable the parties to explore settlement.

25 I declare under penalty of perjury that the foregoing is true and correct. 28 U.S.C.
26 § 1746(2).

27 Executed on May 2, 2025.

/s/ Peter M. K. Frost
Peter M. K. Frost

Date	Attorney	Description	Rate	Time	Omit	Amount
3/21/21	Frost	Review email from Wheeler re Safe harbor problems [.1]	835.00	0.10		83.50
4/2/21	Frost	VM expert re Shasta safe harbor [.1]; TC Hawley re capacity, counsel [.3]; respond Wheeler re review [.1]; read Wheeler response [.1]	835.00	0.50		417.50
4/6/21	Frost	VM/TC expert re Shasta safe harbor agreements, enhancement permits, BiOp, EA, document review, potential claims [1.6]; respond Wheeler re same [.2]; TC Sangye re same [.2]	835.00	2.00		1,670.00
4/7/21	Frost	ESA safe harbor case research [1.3]; confer Bahr re Aiken ruling in first OR district court case, appeal [.3]	835.00	1.60		1,336.00
4/15/21	Frost	TC Sangye re prospective case, SHAs, reading, call next Wed 11 am	835.00	0.30		250.50
4/16/21	Frost	Review folders, docs, forward link to Sangye [.3]; respond Wheeler re call [.1]	835.00	0.40	0.30	83.50
4/21/21	Frost	TC Sangye re prospective case [.5]; VM expert re documents [.1]; read Aiken SHA standing decision and Ninth Circuit reversal, respond Sangye [.5]	835.00	1.10		918.50
4/23/21	Frost	Read/respond Marx re call [.1]; read 2021 NMFS orca priority report re Chinook pops [.8]	835.00	0.90	0.80	83.50
4/27/21	Frost	Emails Sangye re effects on orcas of Klamath Chinook [.3]; email Sangye re status call [.1]	835.00	0.40	0.30	83.50
5/6/21	Frost	Review Wheeler, other responses re call week May 17 [.2]	835.00	0.20		167.00
5/11/21	Frost	TC Sangye/Hawley re prospective case, doodle poll for client call [.1]	835.00	0.10		83.50
5/18/21	Frost	Review EA, associated materials for client call tomorrow [.9]; TC Sangye re cancellation [.1]; TC Wheeler re same [.1]; email out to clients [.1]	835.00	1.20		1,002.00
5/25/21	Frost	Shasta: review comments/responses; TCs Sangye re legal standards; review clients' comments; TC Wheeler re EJ; TC Goldman re Logan; email clients re Net Conservation Benefit doc; read Zoom call info; read FOA cases ED Cal and 9th (MBTA) [2.7]	835.00	2.70		2,254.50
5/26/21	Frost	Conference call prospective clients [1]; TC Hawley re same [.1]; review Wheeler email re NCB finding [.1]; TC Logan Earthjustice re co-representation, parties, venue, state laws, next steps [.5]	835.00	0.80		668.00
7/1/21	Frost	Shasta: Research Dwinnell Dam docs, research prior lawsuit, TC expert re same [1.6]	835.00	1.60		1,336.00
8/2/21	Frost	Shasta: TC expert re Tier 1 waters, amounts, any conferral w Moyle [.9]	835.00	0.90		751.50
8/27/21	Frost	Shasta: TC Amy re research, assignment options [.8]; forward documents [.1]	835.00	0.90	0.90	-
9/10/21	Frost	Shasta: TC Webb re Earthjustice, representation, parties [.4]; TC Wheeler re same, call next week [.2]; TC Sangye re baseline and recovery issues [.3]	835.00	0.90		751.50

Date	Attorney	Description	Rate	Time	Omit	Amount
9/14/21	Frost	Shasta: set up call tomorrow w Tucker [.1]; download Sheehan appellate materials, forward Sangye, calendar oral argument [.2]	835.00	0.30	0.20	83.50
9/15/21	Frost	Shasta: TC Tucker re potential case, issues, parties/opponents, tribes and tribal interests [.4]	835.00	0.40		334.00
9/15/21	Frost	Shasta: Read docs, TC and Zoom call Tucker re watershed, diversions, strategies, parties, tribes and tribal interests [1.4]	835.00	1.40		1,169.00
9/16/21	Frost	TC Sangye re env baseline, read cases re same [.9]; TC Katzen re prospective case, Klamath basin tribal issues [.4]; TC Marx re call tomorrow, claims, parties [.6]	835.00	1.90		1,586.50
9/17/21	Frost	Shasta: Conference call potential clients re potential plaintiffs, venue, costs/fees, claims, relief, in-person meeting [.9]	835.00	0.90		751.50
9/17/21	Frost	Shasta: Read NMFS VSP paper (2000), notes [.9]; read portions of EA, notes [.9]; edits to background memo [.5]	835.00	2.30		1,920.50
9/18/21	Frost	Read 2016 coho status review, notes, edit background memo [1.2]	835.00	1.20		1,002.00
9/20/21	Frost	Shasta: read cases, draft environmental baseline argument, TC Sangye re same [1.1]; read Cooling Water Intake re recovery/survival standards [.4]; research Ninth Cir treatment ESA Consultation Handbook re any Chevron or Auer deference [.5]; research re navigability, ownership of Shasta River bed/banks [.4]	835.00	2.40		2,004.00
9/23/21	Frost	Shasta: research ESA leg hist 73 bills, scientific/propagation provisions, notes, TC Sangye re same [1.3]; recovery plan edit memo re same [.7]; meeting Laws re baseline [.9]	835.00	2.90	0.90	1,670.00
9/29/21	Frost	TC Wheeler re Yurok representation, terms, role in SHA, any conflicts [.4]; state court SHA decision, implications [.2]; TC Sangye re potential case theories [.5]; read/respond client emails, query re Shasta role in ESU, meeting [.3]	835.00	1.40		1,169.00
10/1/21	Frost	Review Webb email, TC Webb re ESU scope, Shasta population, docs re historical importance within ESU; rearing life history, CDFW studies re same and flows, docs [.7]	835.00	0.70		584.50
10/2/21	Frost	Shasta: Condor example research and cases [1.3]; ; draft portions of memo re SHA policy misuse [1.5]; VM Sangye re Fed Reg notice [.1]	835.00	2.90		2,421.50
10/4/21	Frost	Shasta: read Cordalis/Yurok response [.1]; Montague research/edit memo [1.2]; TC Sangye re regulatory history 50 cfr 222.308, and condor 10(a)(1)(A) take permit, next steps [.4]	835.00	1.70		1,419.50
10/7/21	Frost	Shasta: read Fed Reg re issuance of permits [.1]; confer Webb re recent population numbers, documentation [.1]	835.00	0.20		167.00

Date	Attorney	Description	Rate	Time	Omit	Amount
10/11/21	Frost	Shasta: TC Hawley re attorney-client/work product privileges, onset, phone log/client communication duties [.4]; read historic Fed Reg notices to discern regulatory history survival/propagation regs [1]	835.00	1.40		1,169.00
10/13/21	Frost	Shasta: Read 61 FR 21926, notes [.7]; read 58 FR 53320, notes, TC Sangye re same [1.6]; respond Webb meeting [.1]	835.00	2.40		2,004.00
10/18/21	Frost	Shasta: TC Shoemaker re meeting [.2]; VM Marx re same [.1]; TC Sangye re same [.1]; TC Marx re same, logistics, agenda, conflicts check [.3]	835.00	0.70		584.50
10/20/21	Frost	Shasta: meetings Laws/Roses re water quality, no jeopardy opinion, binding terms [.7]	835.00	0.70	0.70	-
10/21/21	Frost	Shasta: Confer Sangye meeting tomorrow [.1]	835.00	0.10		83.50
10/22/21	Frost	Shasta: TC Sangye re-schedule strategy call [.1]; read/respond clients re Nov meeting [.1] NCB research [1.2]	835.00	1.40		1,169.00
11/3/21	Frost	Set up meetings Amy/Roses [.2]; confer Sangye re status of claims, NOI, internal approval [.4]; email clients re 2021 flows, temps, returns data [.1]; research ITP differences from SHA immunity [1.5]	835.00	2.20	0.20	1,670.00
11/4/21	Frost	Shasta: VM/TC OSB Ethics officer re potential conflict w/ representing Cal Trout in 401 case, read OSB ethics opinion, Oregon Ethical Lawyer 10-2; TC Sangye re same [1.2]; review Marx email re temperatures, respond re research queries, BiOp representations [.7]; TC Sangye re same, Montague use of settlement as baseline/basis for SHA [.3]; read Sangye post re same, responses [.2]	835.00	2.40		2,004.00
11/8/21	Frost	Shasta: TC Sangye re game plan for client meeting tomorrow [.3]; billing office trip [.4]; drive EUG to Shasta City [4.2]; initial meeting Shoemaker re new non-profit status, board members, dynamics [1.1]	835.00	6.00	4.90	918.50
11/9/21	Frost	Pre-meeting conferral Sangye [.6]; Shasta clients/expert meeting [6.3]	835.00	6.90		5,761.50
11/10/21	Frost	Shasta: TC Amy/Roses re update [.4]; read EA provision re TAC non-disclosure, email Cordalis re same and call [.2]; review notes and to-dos [.6]; drive Shasta to EUG [4.3]	835.00	5.50	4.70	668.00
11/12/21	Frost	Shasta: TMDL research [.3]; email Webb re 2006 baseline data, monitoring sites [.1]	835.00	0.40		334.00
11/15/21	Frost	Shasta: read final NMF [.2]; read Hawley email re TMDLs, enforceability [.1]	835.00	0.30		250.50
11/16/21	Frost	Shasta: diversions as environmental baseline research [.9]; cf Section 10 baseline research [.9];	835.00	1.80		1,503.00
11/17/21	Frost	Shasta: read Katzen response re tribes, draft Sangye response re venue [.2]; meeting Amy/Roses re assignments [.8]	835.00	1.00	0.80	167.00
11/18/21	Frost	Convert timeslips [.3]	835.00	0.30	0.30	-

Date	Attorney	Description	Rate	Time	Omit	Amount
11/24/21	Frost	Email Marx, Wheeler re case approval [.1]; read responses, calendar retainer call [.1]	835.00	0.20		167.00
11/29/21	Frost	Read Wheeler response litigation approval [.1]	835.00	0.10		83.50
11/30/21	Frost	TC Sangye notice, strategy meeting tomorrow [.1]	835.00	0.10		83.50
12/1/21	Frost	Confer Sangye re Shasta strategy, re-schedule [.2]	835.00	0.20		167.00
12/3/21	Frost	TC Fox re TMDLs, read materials, research re enforceability, nonpoint source (diversions) [1.2]; research re Section 313 action against NMFS re temperature performance indicator [2.2]	835.00	3.40		2,839.00
12/7/21	Frost	Read Stenhouse (2012) re temperatures, read BiOp provisions, read EA re triggering temps, compare Hole in the Wall and Hidden Valley site agreements, TC Sangye re same, review permits, write up draft [2.9]	835.00	1.90		1,586.50
12/8/21	Frost	Read NCRWD TMDL, read cited EPA (2003) recommendations re salmonids, re-read Stenhouse, search/function BiOp re water quality/temperature citations, finalize temp draft argument, email to Sangye w questions/review [1.9]; read SONCC listing, edit draft brief portions [.4]	835.00	2.30		1,920.50
12/9/21	Frost	TC Marx re tribal/NGO strategy meeting Arcata, substance, disclosures [.4]; forward email re NEPA disclosure and permit/site agreement [.3]; contact Tucker re strategy meeting tomorrow [.1]	835.00	0.80	0.10	584.50
12/10/21	Frost	Zoom call clients, tribes, NGOs re Shasta and Scott River issues [2.3]; TC Sangye re temperature data and documents; ESA leg hist; research tasks [.4]	835.00	2.70		2,254.50
12/11/21	Frost	Email clients re meeting follow-up, temperature triggers, FMS document, why canal temps [.3]	835.00	0.30		250.50
12/16/21	Frost	Read Marx response availability call, respond re noon [.1]; review/respond Sangye re same [.1]	835.00	0.20		167.00
12/20/21	Frost	Read/respond Webb email re call this week [.1]; read Marx email re CDFW Big Springs lease, read docs and respond re CEQA compliance, regional board waiver, TMDL compliance [.3]; read H. Repts. 97-537 and 97-835, further research incidental take amendments [1.9]	835.00	2.30		1,920.50
12/21/21	Frost	TC Sangye re intentional/incidental permitting; SH fit; leg hist cites; client call tomorrow [.3]; research re NOAA incidental take regs, unscreened diversions, decision factors [.6]	835.00	0.90		751.50

Date	Attorney	Description	Rate	Time	Omit	Amount
12/22/21	Frost	Complete ESA history, NMFS regulatory, SFA policy review, draft document re argument, circulate to Sangye [1.9]; re-arrange Webb conference call [1.1]; conference call Webb, Sangye re 12 possible claims re BiOp, different standards of review, facts/documents re each, next steps [1.1]; notes re same [2.2]; TC Sangye re same, unique recovery claim [3.3]; read CHERPS BiOp, draft portions of temperature argument, noting needs [1.3]; TC/VM Belchick Yurok/email same, re representation [1.1]	835.00	6.00		5,010.00
1/11/22	Frost	TC Wheeler re Yurok representation, his contacts, next steps; consistency determinations, import; Big Springs and CEQA [6]	850.00	0.60		510.00
1/12/22	Frost	Conference call Webb, Chesney, Sangye re temps [5]	850.00	0.50		425.00
1/15/22	Frost	Read/respond Wheeler re Yurok call [1]	850.00	0.10		85.00
1/18/22	Frost	Confer Sangye re client call today [1]; conference call clients [1]; TC Sangye re same, claims, timing [3]; confer Wheeler re Yurok representation, issues, relief [2]	850.00	0.70		595.00
1/19/22	Frost	Review Wheeler input re Yurok, review tribe's litigation papers in Klamath cases, respond Wheeler re call w outside tribal counsel/Belchik fish bio [1.2]; email Wheeler EPIC re status of calls, Yurok call, participation; forward to Sangye [2]; review/respond Tucker re call Friday [1]	850.00	1.50		1,275.00
1/20/22	Frost	Read/respond re Yurok/Tucker concerns re SHA [3]	850.00	0.30		255.00
1/21/22	Frost	TC Sangye re net conservation benefit, FWS presentation; thoughts re SHA and no jeopardy opinion [4]; TC Tucker re Big Springs and CDFW management, Montague take, non-SHA diversions, coordination with tribes [7]	850.00	1.10		935.00
1/24/22	Frost	Collect notes; work up client claims memo, forward to Sangye [1.6]; review response [1]; respond Webb re Wed call [1]	850.00	1.80		1,530.00
1/25/22	Frost	Review Sangye edited claims synopsis, research documents, edit; prepare Zoom call, confidentiality; email clients [1.3]; research 1600 permit confirmations, cases [1]	850.00	2.30	1.00	1,105.00
1/26/22	Frost	Review/respond Wheeler cannot call in [1]; prep for weekly client strategy call [2]; strategy call [1.3]; notes re same and to-do tasks [2]; review Webb comments/edits to first iteration potential claims worksheet, incorporate some, respond Webb re origin of figure 19 [9]	850.00	2.70		2,295.00
1/31/22	Frost	Read Wheeler email calendar client call Friday [1]	850.00	0.10		85.00
2/1/22	Frost	Email clients re Wed/Fri calls [1]	850.00	0.10	0.10	-

Date	Attorney	Description	Rate	Time	Omit	Amount
2/3/22	Frost	TC Sangye re relief [.3]; TC Webb re relief phase of any suit, NOI, call tomorrow [.3]; prep for conference call Yurok/clients call tomorrow [.6]; conference call Hawley/Sangye relief [.5]	850.00	1.70		1,445.00
2/4/22	Frost	Confer Webb re regional board letter, standards, follow-up [.3]	850.00	0.30		255.00
2/8/22	Frost	ITS research: read new Fed Reg notice, amended regulations, agency explanations; caselaw research parameters use of surrogate, notes [1.9]; confer Webb re downstream RM enrolled properties, docs re rearing habitat downstream [.4]; confer Wheeler re availability tomorrow [.1]; email clients re conference call [.1]; TC Sangye re second iteration potential claims memo [.3]	850.00	2.80		2,380.00
2/9/22	Frost	Shasta client conference call [1.3]; TC Sangye re same, NOI prep [.2]; TC Sangye re disadvantage finding, legislative history re same, read email re same [.3]; TC Wheeler re Yurok, NOI, Karuk history, streambed alteration permits, comments [.6]; read Sangye email re water transfer rule, read text and EPA quest/answer re Dwinnell and NPDES permitting [.5]	850.00	2.90	0.30	2,210.00
2/10/22	Frost	Research best available science cases, admissibility of documents to prove failure, court orders [1.8]	850.00	1.80		1,530.00
2/14/22	Frost	TC Sangye re status of NOI, claims [.3]; research any jeopardy w slight improvement, cases, briefing [1.9]	850.00	2.20		1,870.00
2/15/22	Frost	TC Belchik Yurok re claims, notice, timing, next steps [.4]; TC Sangye re same, ITS [.2]; research Yurok v Bur Rec case, orders, ITS claims [1.3]; research species specific triggers [.9]	850.00	2.80		2,380.00
2/16/22	Frost	Review notes, conference call Sangye, clients [.7]; email Sweeney re press [.1]	850.00	0.80	0.10	595.00
2/17/22	Frost	TC Webb re irrigation district/irrigated areas maps, SHA covered areas, bases for mapping, declaration; NPDES permitting for Montague [.4]; TC Sangye re water transfers rule, legal research same [1.9]; read NCRWQB 2012 Temp Policy [.3]; read CHERP BiOp and notes, queries Webb re discharges [1.3]	850.00	3.90		3,315.00
2/20/22	Frost	Review client email re NOI, edits; respond same and queries re media [.1]	850.00	0.10		85.00
2/22/22	Frost	TC Wheeler re representing Yurok, communications re Belchik, NOI [.3]; review client recommended edits to NOI, incorporate [.8]	850.00	1.10		935.00

Date	Attorney	Description	Rate	Time	Omit	Amount
2/23/22	Frost	Conference call clients re notice, Yurok, temp std, press release, next steps [.6]; TC Sangye re same and review release, NOI [.1]; review/edit notice [.4]; VM/TC Flanders re CA ethics requirements retainer agreements [.3]; check ethical rules re rates [.4]; review/edit proposed retainer, email to clients [.8]; review press release, edits [.2]	850.00	2.80		2,380.00
2/24/22	Frost	Read Cal Prof Code, cases, TC Flanders re approach [.9]; read final release, media [.3]; draft, edit, finalize retainers, to clients [1.2]; confer Sangye re NOI [.1]; check Scoble re service [.1]	850.00	2.30		1,955.00
2/25/22	Frost	Respond Scoble re FOSR retainer [.1]; confer Wheeler re EPIC retainer [.1]	850.00	0.20		170.00
3/4/22	Frost	Jeopardy research, forward case brief to Sangye, check Ninth docket, note dismissal [1.3]	850.00	1.30		1,105.00
3/8/22	Frost	Read Sheehan case Ninth, notes [.6]; TC Sangye re same, effects [.4]; watch oral argument [1]; TC Wheeler re decision [.3]; emails clients re board changes FOSR [.2]; set up conf call w Webb [.1]; TC Wheeler re changes [.2]; TC Sangye re ethical questions re conflicts, retainer [.2] conference call Webb, Sangye re board changes, policies, retainer, conflicts, multiple representation [.5]	850.00	3.50		2,975.00
3/15/22	Frost	TC Sangye re NOAA NOI call, strategy; retainer agreement [.2]; read CA ethical rules and cases re client conflicts and representation [1.9]; TC Webb re retainer, appointed rep [.3]; conference call NOAA, Sangye re settlement [.4]; TC Sangye re same [.1]	850.00	2.90		2,465.00
3/16/22	Frost	Read respond Joslin re retainer [.1]; email Sangye re prospective days/times for NOAA call [.1]	850.00	0.20		170.00
3/21/22	Frost	Email Laurie Beale NOAA re call this week [.1]; read response, calendar call [.1]	850.00	0.20		170.00
3/22/22	Frost	Emails Brannon re NOAA call today [.1]; TC Sangye/Brannon to prep [.2]; conference call NOAA attorney and staff re NOI [.4]; respond Webb re retainer call tomorrow [.1]	850.00	0.80	0.10	595.00
3/23/22	Frost	Strategy call Joslin, Webb, Chesney re NOAA call, claims, parties, retainer provisions and confidentiality boundaries [1]; TC Sangye re same, discuss confidentiality needs re Montague and other meetings [.4]; research conflict of interest pre-nup agreements, email clients proposed additional language [1.6]	850.00	3.00		2,550.00
3/28/22	Frost	Client emails re NMFS meeting, concerns, resolutions [.8]	850.00	0.80		680.00
3/29/22	Frost	Review client query hatchery fish, read SONCC listing, recovery plan provisions, respond same [1.3]; read literature genetic influence, spawning success, notes [1.4]; review/respond Chesney chart data [.2]; email Joslin/Wheeler re revised retainers [.1]	850.00	3.00		2,550.00

Date	Attorney	Description	Rate	Time	Omit	Amount
3/31/22	Frost	Conf call Mellgren, Sadie, Sangye re Yurok and potential conflicts [.4]; conference call clients re retainer, data to request from NMFS, NMFS settlement call next week [.8]; Follow-up with Sangye [.2]; circulate modified retainers [.2]; draft four item requests, circulate [.2]	850.00	1.80		1,530.00
4/1/22	Frost	Review client responses re requested info, email NOAA attorneys [.3]; query Lawlor re Mangels visit [.1]; read NOAA attorney responses [.1]	850.00	0.50		425.00
4/4/22	Frost	Arrangements settlement call tomorrow [.9]	850.00	0.90		765.00
4/5/22	Frost	Review notes [.3]; settlement conference call NMFS/clients [1.3]; TC Sangye re same [.3]; review client updates re info and reaction [.7]	850.00	2.60		2,210.00
4/7/22	Frost	Review client emails [.1]; calendar conference call next Tuesday [.1]	850.00	0.20		170.00
4/12/22	Frost	Read new water quality report, notes [.9]; status conference call clients, Sangye [.9]	850.00	1.80		1,530.00
4/21/22	Frost	Listen to San Luis Obsibo/Twitchell Dam take case Ninth [.6]; read client confirmation call next Tues [.1]	850.00	0.70		595.00
4/27/22	Frost	Meeting Schwab re 2017 BiOp, environmental baseline, research [.5]; consider next steps [.5]	850.00	1.00		850.00
4/28/22	Frost	Read emails re client conf call [.1]; confer Sangye re NOI timing, receipts [.1]; client status conference call [1]; notes and doc needs [.2]; check NOAA FOIA regs, draft FOIA request, email to Webb [.9]	850.00	2.30		1,955.00
5/9/22	Frost	Conference call Hawley, Sangye re environmental baseline, Shasta decree, state/private actions [.4]; research caselaw re same [1.7]; read documents, work up Montague description, claim re same and baseline [3.2]; ECF search Karuk/Dwinnell settlement agreement, read, VM Wheeler re same [.4]	850.00	5.70		4,845.00
5/10/22	Frost	Confer Sangye, email clients re status call, change of time [.1]; read responses [.1]; confer Sangye re Montague settlement, Karuk representation [.3]; read EA, notes and changes to brief [1.9]	850.00	2.40		2,040.00
5/11/22	Frost	Read temperature documents, FMS, edit temperature argument [1.9]; confer Sangye re ESA Handbook provisions, Sec 7 environmental baseline, changes to argument, his review of draft [.6]	850.00	2.50		2,125.00
5/12/22	Frost	Review notes [.3]; clients/Sangye status conference call re 9 agenda items, to dos [1]; notes re same and next steps [.4]; TC Sangye to confer, progress on environmental baseline issues [.3]	850.00	2.00		1,700.00

Date	Attorney	Description	Rate	Time	Omit	Amount
5/16/22	Frost	Confer Hawley, Bishop, Sangye re ITS, surrogate, tertiary, claims [.7]; TC Webb re non profit status, corp papers, FOIA request [.4]; draft last, email to Webb [.3]; review Webb response, edit, forward, confer Sangye re same [.3]; email Webb re forward [.1]	850.00	1.80		1,530.00
5/18/22	Frost	Conf call clinic student/Sangye re baseline [.8]	850.00	0.80	0.80	-
5/19/22	Frost	Call expert re Yurok, ITS [.4]; TC Sangye re same [.1]	850.00	0.50		425.00
5/20/22	Frost	Read docs, email clients re historic flows, complete draft temp argument [.9]; TC Sangye re same, strategic use of validation monitoring re ITS claim [.3]; read Webb post re instream flows, respond [.2]; read Karuk, McBain et al comments on draft EA, notes [.9]	850.00	2.30		1,955.00
5/23/22	Frost	Read Desert Survivors case re best available science [.3]	850.00	0.30		255.00
5/24/22	Frost	Read cases, record/documents, draft action area argument [1.8]; TC Sangye re his completion draft ITS argument, submerged lands ownership, concession re downstream areas excluded from action area [.3]; email Wheeler re same [.1]	850.00	2.20		1,870.00
5/25/22	Frost	TC Sangye re geographic scopes recovery, jeopardy, action area; research cases re same Butte et al [.9]; complete action area argument, to Sangye [.7]; VM Webb re salmon heaven, riparian lands [.1]; TC Webb re same [.2]; NCRWQB zoom call re drought, water restrictions [1.9]	850.00	3.70	1.90	1,530.00
6/1/22	Frost	Complete reading cases, record cites, and complete draft ITS argument [2.2]; conference call Brian/Renata/Sangye re filing, theme, media, client coordination [.7]	850.00	2.90	0.70	1,870.00
6/2/22	Frost	TC Sangye re ITS tautology claim, others [.4]; client status call [1]; review notes and create to-dos [.2]; email Sweeney/Renata re press [.1]; read response [.1]	850.00	1.80		1,530.00
6/6/22	Frost	Text response Sangye media call [.1]	850.00	0.10	0.10	-
6/8/22	Frost	ITS argument doc review and argument revisions [1.1]; action area doc review and same [.7]; environmental baseline conundrum re BiOp theory, read provisions, TC Sangye re same, edit argument [1.9]; multiple emails Webb re monitoring stations, edits temp argument [.9]; read 2020 CDFW Shasta report, edits [.6]	850.00	5.20		4,420.00
6/10/22	Frost	Reading local rules, complaint prep [1]; read new BOEM Ninth Cir opinion re NEPA adequacy [.4]; TC Sangye re public ownership bed and banks, Safe Harbor implications, his Section 10 write up, length/density [.7]; read Tribal comments pp. 1-35, edit complaint, draft substantive arguments [1.8]	850.00	3.90		3,315.00

Date	Attorney	Description	Rate	Time	Omit	Amount
6/13/22	Frost	Read client proposed edits and comments on draft complaint background section, research documents and incorporate edits [2.7]; confer Joslin/Wheeler re jurisdictional statements, memberships, specificity re allegations [4]; claim review and edits [8]	850.00	3.90		3,315.00
6/14/22	Frost	TC Sangye re Section 10 claims [4]; review/propose edits to clients' press release [3]; review responses [1]; confer Webb re Montague delivery amounts, edit [3]; TC Wheeler re pro hac, filing, review [3]	850.00	1.40		1,190.00
6/15/22	Frost	Review Sangye's proposed edits/additions to complaint, research Sec 10 claim formulation, adopt/finesse edits [1]; email final draft to clients for review [1]; read FOSR response, edits [2]; read final draft press release [1]; read Webb response, edits [2]; TC Sangye re Wheeler and filing, pro hac forms [2]; TC Wheeler re assignment [1]	850.00	1.90		1,615.00
6/16/22	Frost	Email Sweeney et al re media [1]; client status call [1]; read Sangye follow-up re water transfers rule, EPA rule and commentary [4]; read Wheeler email re media [1]; TC Sangye cert good standing, access/apply; fill out PHV form [3]	850.00	1.90	0.30	1,360.00
6/21/22	Frost	Read/respond Preso re call re safe harbor agreements [1]; research development of policy, check all FR citations [1.8]	850.00	2.90		2,465.00
6/22/22	Frost	Search regional water board cite Montague docs, download, read [9]; TC reg bd temp staffer re 18 and 16, documents, status of Montague petition to State Board re SHA [8]; TC reg bd general permit staffer re status of Flying L pump NPDES dischargers, email him re same, read response, save docs [7]; read responsive documents, notes re AR and any discovery, edit temp argument [1.8]; email Sangye re call tomorrow [1]; read water board email and docs; notes, confer Chesney re Montague 2021 report data, what's missing [9]	850.00	5.20	3.00	1,870.00
6/23/22	Frost	Read Ninth Cir glyphosphate case re APA applied to data/reports, notes [6]	850.00	0.60	0.60	-
6/28/22	Frost	Review/respond Joslin re ELF and drought regulations, topic for Thurs status call [1]	850.00	0.10		85.00
6/30/22	Frost	TC ECF help desk, fix password, e-file PHV [2]; confer Sangye re client call [1]; client call re update and strategy [6].	850.00	0.90	0.20	595.00
7/1/22	Frost	Read pro hac vice order [1]; VM Sangye re magistrate decline [1], fill out form, e-file [1]	850.00	0.30	0.10	170.00
7/5/22	Frost	Multiple tries ECF declination, conferrals courtroom deputy [3]; read reassignment to Judge Corley, research her enviro cases [9]; email ND Cal colleagues [1]	850.00	1.30	0.30	850.00

Date	Attorney	Description	Rate	Time	Omit	Amount
7/6/22	Frost	VM Nate Kane re Montague state claims [.1]	850.00	0.10	0.10	-
7/7/22	Frost	Read Sangye email Zoom call [.1]; client status/update/strategy call [.6]; VM/TC regional water board staffer re TMDL numeric targets temp DO, CHERP standard, Montague petition to State Board [.8]; research same and forward docs to clients [.4]	850.00	2.90		2,465.00
7/8/22	Frost	Review Joslin email re Reg Bd protest of SHA petition, read associated documents, notes for files [.9]	850.00	1.90	1.90	-
7/11/22	Frost	Read Joslin/Wheeler litigation hold letter responses [.1]	850.00	0.10		85.00
7/17/22	Frost	Read state board email re dam and water objective compliance, read associated doc, forward Kane [.4]	850.00	0.40	0.40	-
7/19/22	Frost	Read Webb email forwarding Scott info re Montague and WDRs, respond same and forward Sangye [.2]	850.00	0.20		170.00
7/26/22	Frost	Read/respond Mellgren re Wheeler [.1]; forward to Sangye [.1]	850.00	0.20		170.00
7/28/22	Frost	Email clients re-schedule status call [.1]; read responses [.1]; read ECF, re-calendar case management conference [.1]	850.00	0.30		255.00
7/28/22	Frost	Confer Sangye re difficulty in Silver Spring MD service to NOAA [.1]	850.00	0.10		85.00
8/2/22	Frost	Review guidelines for professional conduct in ND Cal [.3]	850.00	0.30		255.00
8/2/22	Frost	TC Sangye re status/plan [.3]	850.00	0.30		255.00
8/6/22	Frost	Email Herman re NOAA 16C request [.1]; find MWCD 2021 report, forward clients [.1]	850.00	0.20		170.00
8/9/22	Frost	Read ECF DOJ notice of appearance, TC Sangye re same, Westlaw case research re same [.3]	850.00	0.30		255.00
8/11/22	Frost	Status call clients / agenda items / follow-up [.6]; review and propose edits FOSR to SWRB [.7]; read Wheeler text, TC Sangye, email Grosko/O'Keefe re coordination call tomorrow [.2]	850.00	1.50	0.70	680.00
8/15/22	Frost	Read O'Keefe draft stip, check LR re stip and timing, email back [.1]	850.00	0.10		85.00
8/15/22	Frost	Review documents, notes, TC Webb re origination of temp std, protest, docs. review some [2.9]	850.00	2.90		2,465.00
8/17/22	Frost	Read Null (2009), notes [.6]; read protest Att 1 [.4]; email clients re Chesney, Null, Welsh studies and displacement [.4]; read responses [.2]	850.00	1.60		1,360.00
8/18/22	Frost	Client status call, to do list [.8]; confer Sangye re SH baseline claim [.3]	850.00	1.10		935.00
8/19/22	Frost	Email Kane re update re reg bd meeting Montague WDRs [.2]; confer EPIC re its FOIA request re reporting, check documents, respond [.3]; read Amber response, respond [.1]	850.00	0.60		510.00
8/22/22	Frost	Read JSC standing order, read general CMS order, read local rules, draft provisions of joint CMS [2.7]	850.00	2.70		2,295.00

Date	Attorney	Description	Rate	Time	Omit	Amount
8/22/22	Frost	Email EPIC re FOIA request [.1]	850.00	0.10	0.10	-
8/23/22	Frost	Query Sivas/Sanders Stanford re non-interested entities disclosure; confer Sangye re same [.3]; joint CMS prep re cases re discovery in ESA claims [1.7]; read State Water board draft order re illegal diversions during curtailment [.2]; circulate to clients, query re permittees [.1]; read response [.1]; TC Sangye re application w state law regulatory provision, origin, history [.3]	850.00	2.50		2,125.00
8/25/22	Frost	Read WD WA KW BiOp challenge order, circulate to Sangye [.4]; read Amber FOIA update [.1]	850.00	0.50		425.00
8/29/22	Frost	Read ECF judge reassignment [.1]; check web for Thompson background, any standing orders, email clients re same; confer Sangye re same [.4]	850.00	0.50		425.00
8/30/22	Frost	Email Webb re St Clair/Scott meeting [.1]; read response, respond [.1]; read Cal Matters investigation re illegal diversions [.3]	850.00	0.50		425.00
8/31/22	Frost	Check court and case documents, TC Sangye, draft and email proposed certification [1]; read documents [3.9]; coordination re call tomorrow [.2]	850.00	5.10		4,335.00
9/1/22	Frost	Emails clients changed conf call [.1]; read Thompson background, confer Sanders re same [.3]; confer Sangye, finalize/file Cert Interested Entities [.2]; read up, calendar ADR responsibilities [.6]; conference/status call clients re venue, new judge, curtailments and violations, any redress, state/regional board actions [1]; follow up research re state ownership bed banks Shasta [1.9]	850.00	4.10		3,485.00
9/2/22	Frost	CA navigability research [1.9]; read ECF reassignment to Judge Thompson [.1]	850.00	2.00		1,700.00
9/8/22	Frost	Client status call [.8] calendar Reg Bd call tomorrow [.1]; read KID v. BuRec re Klamath flows, drought, tribal sovereignty [.9]; review documents, prepare questions for Reg Bd meeting [1.9]	850.00	3.70	2.00	1,445.00
9/12/22	Frost	Finalize issues clients and regional board, forward [.8]; read Webb post and data re elevated temperatures 3/4 mile downstream of Dwinell, respond re meeting [.2]	850.00	1.00		850.00
9/16/22	Frost	Read LR, ADR rules, ADR handbook, email clients synopsis, set/calendar call to discuss provisions/requirements/opportunities [1.3]; read Lusardi, Chesney studies, net pen data, check BiOp, draft Lusardi response and citation check, forward Chesney [1.7]	850.00	3.00		2,550.00
9/17/22	Frost	Email Webb re proposed reply to MWCD protest response [.2]	850.00	0.20		170.00
9/21/22	Frost	Email Webb re MWCD protest re temp [.1]	850.00	0.10		85.00

Date	Attorney	Description	Rate	Time	Omit	Amount
9/22/22	Frost	Read ADR documents [.4]; conference call clients re three processes, opportunities, outcomes [1.1]; draft certification email to Sangye [.2]; read client emails re standing decs, preliminary research qualifications as 'member' [.6]	850.00	2.30		1,955.00
9/23/22	Frost	Read EPIC board/bylaws, reply re membership [.2]	850.00	0.20		170.00
9/26/22	Frost	Read Ninth Cir Twitchell Sec 9 take opinion/dissent [.8]	850.00	0.80		680.00
9/27/22	Frost	Read Webb emails, cases re title/navigability, respond same [2.6]; read MWCD application permit changes, notes, VM Webb re same [1.6]; read Grosko email re ADR certification, e-file ours [.1]	850.00	4.30		3,655.00
9/28/22	Frost	Review docs, conf call Webb temperature standard, MWCD protest response, prior rights deliveries, monitoring stations and data, next steps [1.4]; update notes and case strategy/claims [.9]	850.00	2.30		1,955.00
9/29/22	Frost	TC Wheeler re standing declarant, CDFW public trust duties based on indigenous populations, approach re case strategy [.5]	850.00	0.50		425.00
9/29/22	Frost	Status conference call clients/Sangye [.8]; TC Sangye re Renata/Sweeney coordination [.1]; review Sangye email re differences in take permit restrictions, check re same, respond re conference call [.7]	850.00	1.60		1,360.00
9/30/22	Frost	TC Hawley ITP/ESP permit distinctions, broader discussion [.3]	850.00	0.30		255.00
10/3/22	Frost	Conf call Sweeney Harrison re media campaign, components, next steps [.9]	850.00	0.90	0.90	-
10/4/22	Frost	Read ECF case management statement/conference; confer Sangye re local counsel [.1]; email DOJ proposed timing draft CMS [.1]; review response [.1]; confirm call w Nat Kane Thurs [.1]	850.00	0.40	0.10	255.00
10/5/22	Frost	TCs Webb, Chesney re petition protest response/reply, scientific studies, reg bd guidance, reg bd meeting today, Bain flow position [1.3]; work up draft reply [2.6]	850.00	3.90		3,315.00
10/12/22	Frost	Meeting Sangye AR, exceptions, case management strategy [.4]	850.00	0.40		340.00
10/13/22	Frost	Email Brett/Hannah delay in draft CMS [.1]; draft CMS components [1.4]	850.00	1.50		1,275.00
10/15/22	Frost	Review Sangye's proposed changes to joint CMS, change/edit schedule, check order format, return for his review/changes [.5]	850.00	0.50		425.00
10/16/22	Frost	Review/complete draft CMS, forward to Sangye, review response, forward edited version, review response, incorporate edits, forward to Groske/O'Keefe for review [1]	850.00	1.00		850.00

Date	Attorney	Description	Rate	Time	Omit	Amount
10/21/22	Frost	Email Grosko re status of joint CMS [.1]; read Rock Creek mine opinions re scope of jeopardy analysis, sufficiency of mitigation measures, no jeopardy bases; notes [.9]; read Grosko response [.1]	850.00	1.10		935.00
10/24/22	Frost	Email Grosko re draft CMS, call [.1]; conferrals Sangye, draft CMS components [.8]; final draft eve [.3]	850.00	1.20		1,020.00
10/25/22	Frost	Shasta CMS emails/drafts [.3]; conf call Grosko/DOJ [.5]; confer Sangye, update and format draft, to Grosko [.4]; emails client re conference call [.2]; TC Sangye, read his proposed edits on CMS, fine tooth comb and further edits [.7]	850.00	2.10		1,785.00
10/26/22	Frost	Edit/next iteration proposed joint CMS to DOJ [.3]; confer Sangye re same [.1]; TC Webb client re local cooperative solution; State Board approval wo public notice; regional board call; temperature standards [.6]	850.00	1.00		850.00
10/27/22	Frost	Conferrals re clients/Sangye re CMS [.3]; email Grosko re same [.1]; client status/strategy call [1]; review Grosko response, edit doc, return [.1]; review Grosko email, form fix, TC Grosko [.1]; email Grosko re amendment [.1]; confer Sangye re filing, e-file [.1]; email Chesney re document [.1]; review Joslin email, respond re text re standing declaration, testimony [.3]; confer Amber, email Miller re expert testimony [.3]	850.00	2.50		2,125.00
10/28/22	Frost	Research caselaw admission/weight expert testimony ESA cases; read Benson Ridge order re same, notes [1.3]; confer potential expert, scope/subject, timing [.8]; confer clients re same, costs [.3]	850.00	2.40		2,040.00
11/1/22	Frost	Read ECF amended CMS [.1]; confer Sangye scope of jeopardy determination, potential responses [.3]; work up draft of temperature reply [1.6]; TC Wheeler re meeting [.1]; TC expert re meeting, jeopardy determination [.1]; arrange travel [.3]	850.00	2.50		2,125.00
11/2/22	Frost	TC Amber re expert/relief declarant, background, expertise; standing declarants, backgrounds, status of draft declarations; visit [.7]; complete review temperature reply, forward to Webb for review [.9]; confer Sangye CMS tomorrow [.1]	850.00	1.70		1,445.00
11/3/22	Frost	Call in, wait for, participate in CMC [.5]; TC Sangye re same, next steps [.3]	850.00	0.80		680.00

Date	Attorney	Description	Rate	Time	Omit	Amount
11/4/22	Frost	Read/respond Webb re temperature reply [.1]; email Webb re historic flows/temps [.1]; read draft ITS argument, re component (1.2), research and read cases, begin re-cast and focus, writing up component [1.7]; read/respond Jamieson re film [.1]; email Sangye re Zoom link [.1]; weekly client status call, go over CMS and hearing yesterday [.5]	850.00	3.80	0.10	3,145.00
11/7/22	Frost	Read ECF CMS minute order, confer Sangye re initial disclosures, email DOJ re understanding of deadline [.2]; TC Webb re review of temp reply, visit [.3]; review/respond expert re visit [.1]	850.00	0.60		510.00
11/8/22	Frost	Confirm Mon Nov 11 SC meeting [.1]; TC Webb re hatchery proportion adult returns, listing, argument, NMFS assertion [.5]; Recovery Plan pp. ES-5 to 5-6 review [1.6]; TC Bishop re use of experts [.3] TC Webb re status of his review temp reply [.2]; email Mangels meeting [.1]; read cases, thorough edit ITS argument [2.4]	850.00	5.20		4,420.00
11/9/22	Frost	Review/respond client re standing dec, review [.1]; review/respond Wheeler re meeting tomorrow [.1]; travel EUG to ARC [5]	850.00	5.20	2.50	2,295.00
11/10/22	Frost	Prep for and Arcata meeting Tucker re tribal concerns, strategy [2.3]; review Recovery Plan and edit argument sections [2.4]; meeting Arcata relief expert, follow up queries [1.3]; meeting client Wheeler re strategy, claims, standing decs, AR review [1.1]	850.00	7.10	3.60	2,975.00
11/11/22	Frost	Travel ARC to Davis [5] meeting potential expert [1.1]	850.00	6.10	2.50	3,060.00
11/14/22	Frost	Review/respond Groske re IDs [.1]; review notes, meeting clients [1.5]; review their documents [.8]; travel SHS to EUG [3.5]; listen to Groske VM re CMS [.1]	850.00	6.00	1.75	3,612.50
11/15/22	Frost	Billing trip [.5]	850.00	0.50	0.50	-
11/16/22	Frost	Meeting Sangye re claims, development, record, CMS, strategy [1.1]; review/edit media piece, email clients re same and SAC Bee [.3]; confer Joslin re standing dec [.2]; work up SHA challenge, email attorneys in Sheehan re BiOp ITS [1.9]	850.00	3.50		2,975.00
11/17/22	Frost	Read Grosky proposed motion/order, compare joint CMS, confer Sangye re proposal, confer with clients, respond Groske [.4]; read Amber email re media edits, Norris dec, respond same [.3]; read Norris changes, save [.2]; read ECF, note misspelling in proposed order [.1]; work on SHA/ESA argument [1.7]	850.00	2.70		2,295.00

Date	Attorney	Description	Rate	Time	Omit	Amount
11/21/22	Frost	Confer Sangye action area argument, physical effects, mesh w no jeopardy challenge [.6]; read/review similar CA CEQA case [.4]; confer Sangye his review ITS argument, project completion standard, use [.3]	850.00	1.30		1,105.00
11/22/22	Frost	Confer Sangye re his review of draft claims, esp environmental baseline; need to amend pleadings; next steps [.4]	850.00	0.40		340.00
11/26/22	Frost	Complete review Karuk settlement [.4] email Kane re WDRs [.1]	850.00	0.50	0.10	340.00
11/28/22	Frost	Confer client re McBain contact, background, accessibility [.4]; review client email, TC Sangye re call, substance, availability [.3]; email McBain Zoom link [.1]; review client draft relief request; research NMFS requirement to determine legality of covered activities; read EA response re same; read NMFS handbook guidance re same; TC Sangye re same, need for client conferral re relief components [2.2]	850.00	3.00		2,550.00
11/30/22	Frost	Confer Sangye re track/change amended complaint [.1]; devise agenda tomorrow status call [.2]	850.00	0.30		255.00
12/1/22	Frost	Read Genshaw draft standing dec, track/change comments, return [.7]; review Joslin draft standing dec, track/change comments, return [.8]; client status conf call [.9]; review Sangye edits latest draft, research notes, track/change acceptance, further edits [1.3]	850.00	3.70		3,145.00
12/6/22	Frost	Confer Chesney screw trap data, action area, rearing habitat [.5]; email Sangye proposed DOJ email [.1]; review response [.1]	850.00	0.70		595.00
12/7/22	Frost	Read client emails re conflicts, cancel, re-schedule tomorrow's status call [.1]; email DOJ re amending complaint [.1]; confirm Sangye meeting temps tomorrow [.1]	850.00	0.30		255.00
12/8/22	Frost	Meeting Sangye temp argument, documents, AR, strategy [.7]; work up complaint amendments [3.4]; review/respond Webb re monitoring stations [.3]; confer Webb re TMDL meeting, follow-up [.3]; read/respond Kane re Montague WDR call next week [.1]	850.00	4.80		4,080.00
12/9/22	Frost	Emails Webb amended pleading [.2]; read gages chart, query re data [.3]; confer Sangye DOJ non-response [.1]	850.00	0.60		510.00
12/15/22	Frost	TC Sangye re core habitat, amendment, status call [.3] read emails re call, next steps [.2]	850.00	0.50		425.00
1/3/23	Frost	Confer Sangye re media google doc [.1]; review same, forward Sweeney/Harrison for review, call Thursday [.1]; review Joslin first draft standing dec, track/change proposed edits, queries, return [.9]; review Gensaw first draft standing dec, track/changes proposed edits, forward McGinnis formatting [.8]	865.00	1.90		1,643.50

Date	Attorney	Description	Rate	Time	Omit	Amount
1/4/23	Frost	Read Webb response St John retirement, PRA [.2]; forward clients' edited media link w cover to Sweeney for review, participation Thurs status call [.3]; confer Sangye re DOJ and amending complaint, project file vs AR [.3]; read Grosko email re amendment [.1]; read Recovery Plan pp. 5-6 to R1-70 [1.2]	865.00	2.10		1,816.50
1/6/23	Frost	Read ECF filing of AR, download, TC Sangye re same and search function, combination [.3]; read Wheeler email to clients re AR [.1]; format open SJ brief [.3]	865.00	0.70	0.30	346.00
1/7/23	Frost	TC Sangye re AR, omnibus search, bates stamps, identifying docs, organization, tasks [.4]; TC Sangye relief, declarant[s]][.3]; TC Sangye re amending complaint by Jan 16, prospect adding claims [.2]	865.00	0.90		778.50
1/9/23	Frost	Read Joslin query re HVR [.1]; read Webb response [.1]; read/edit media piece [.3]; read Sweeney response same [.1]; confer Sangye AR contents, organization, search mechanism; read his email re same and included documents [.4]; respond re full cites and searchability for docs cited in docs [.2]; TC Wheeler re AR review, client involvement, roll out [.4]; email all clients re update on standing decs, AR compilation and review, next steps towards opening brief [.3]; respond Grosko re not opposing vs consenting to amending complaint, confer Sangye re same [.2]	865.00	2.10		1,816.50
1/10/23	Frost	Read Sangye email, forward updated AR link to clients [.1]; read Webb email, explain AR and omitted communications, grounds [.4]; review draft of background section, edits [1.3]; email Sangye re document and AR; read response [.1]; TC Sangye conversion docs to AR cites [.1]; review/edit argument sections [1.9]; read Grosko email re amending complaint, respond [.1]	865.00	3.90		3,373.50
1/11/23	Frost	Read Sangye conferral Webb re AR and excluded docs, confer Sangye re same [.3]; read/respond Webb re regional board response re Montague [.2]; read draft arguments, edit, email clients re support for a cite, confer re case citations [2.4]	865.00	2.90		2,508.50
1/12/23	Frost	Consider/confer Sangye re agenda for counsel/client status call [.3]; conference call [.8]; review last proposed amended complaint, consider any missing specificity, TC Sangye re same and claim, email Grosko re filing [.6]; e-file [.1]; respond Amber re Gensaw availability and edits [.1]; TC Chesney re prospective dec, substance [.6]	865.00	2.50	0.10	2,076.00

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1/14/23	Frost	Read/respond Webb re Montague reporting data, TMDL compliance [.3]; read/respond Kane re PRA re data, daily averages, CWA monitoring compliance [.3]	865.00	0.60	0.60	-
1/17/23	Frost	Read AR formatting, index, compare two, confer Sangye re same and missing last bates stamp numbers, citation form, DOJ and court rectifications [.6]; proof/add cites to memo from full cite form [.9] read/respond Webb, Kane re Montague WDRs, temps [.4]; add edits ESA background section [.9]	865.00	2.80		2,422.00
1/19/23	Frost	Confer Joslin re standing dec [.2]; email Amber re Gensaw dec [.1]; TC Webb re relief dec, adult counts/escapement; temp and flow data 2021; irreparable harm [.8]; TC Sangye re Big Springs AR cite, USEPA doc [.2]; TC Webb re Montague WDRs and reporting, research state cause of action [2.8]; brief writing temps [1.8]	865.00	5.90		5,103.50
1/24/23	Frost	Review draft brief to date, edits [1.4]; TC Webb re irrigation return flows, spring diversions, his review draft brief [.4]; forward same w notes on emphases [.2]	865.00	2.00		1,730.00
1/25/23	Frost	Review AR, confer Sangye re docs [.3]; research Ninth Cir and DCT cases re completing or supplementing AR, and how judicial notice plays in [1.9]; draft email to DOJ for Sangye review re same [.2]; review his response [.1]; VM Sangye difference between completing and supplementing [.1] TC Webb re temperature docs, his review draft brief, DOJ's redactions in AR, legal challenges [.9]; email Sangye again re complete v supplement AR [.1]	865.00	3.60		3,114.00
1/26/23	Frost	Read AR complete/supplement cases, notes re AR citations/referrals/discussions; TC Sangye re same and strategy [2.8]; TC Sangye re final draft email, note review, email DOJ [.2]; review Webb Excel temp data, query; read respond Webb re admissions in EA comment responses, read respond Webb re RCD data and reports [.7]	865.00	3.70		3,200.50
1/31/23	Frost	Text and numeric searching effects on coho of flood irrigation and tailwater return flows [1.8]; respond client re AR search and refining [.2]; confer Sangye re Montague habitat blockage, conflicting data in AR [.3]; read/respond client re AR search query [.1]	865.00	2.40		2,076.00
2/1/23	Frost	Confer Sangye re next steps re prosecuting case, response to DOJ re AR, what is in AR [.4]; confer Sangye re brief, his input [.3]; TC Webb re monitoring stations, temp data relief [.5]	865.00	1.20		1,038.00

Date	Attorney	Description	Rate	Time	Omit	Amount
2/2/23	Frost	Complete review Recovery Plan, research Greenhorn dam, edits to brief based on plan [1.9]; status call Sangye, clients [1.8]; read 2016 Status Review, notes and edits to brief [1.9]; TC Sangye re point source discharge claim [1.2]; edit draft email to Groske re AR, forward to Sangye [1.1]	865.00	3.90		3,373.50
2/3/23	Frost	Review Sangye response re AR email [1.1]; edit/email Groske [1.1]; read expert response [1.1]	865.00	0.30		259.50
2/6/23	Frost	Read Joslin email re temp triggers, re Montague site agreement, email Joslin re trigger [1.6]; read Flow Management Strategy, notes [1.8]; TC expert re same and BiOp [1.8]; confer Sangye re status his review/edits draft brief, arguments [1.2]	865.00	3.40		2,941.00
2/7/23	Frost	Read Appalachian Valley case, edits to brief [1.1]; confer Webb re record and fact cites, add [1.3]; confer Sangye re his draft of brief components [1.3]	865.00	1.70		1,470.50
2/8/23	Frost	Meeting Jillian re relief and proof [1.9]; read Webb emails, incorporate facts/arguments re coho distribution and intrinsic potential [1.7]; read Webb email re comments, check Zip file, TC Sangye re same and Friday deadline for any motion, search AR for same [1.6]; email Groske re response to supplementing AR with proffered docs [1.1]	865.00	2.30	0.90	1,211.00
2/9/23	Frost	Status call clients, Sangye re review draft brief, standing and relief declarations, relief components [1]; confer Sangye re same [1.3]; best available science research and additions [1.7]; TC Chesney re relief, contents declaration [1.4]	865.00	2.40		2,076.00
2/10/23	Frost	Research statutory, regulatory, policy, BiOp monitoring duties, notes [1.1]; TC Webb re same, Karuk comments [1.2]; prepare for Sangye strategy/complete work meeting [1.4]; meeting Sangye re same, tasks, substance of claims, calendar [1.5]	865.00	1.80		1,557.00
2/14/23	Frost	TC Sangye re status of brief, today's strategy and needs [1.3]; Read Flow Management Strategy, notes, edits to brief [1.2.8]; TCs/emails Webb re map, contours, presentation [1.1]	865.00	3.20		2,768.00
2/15/23	Frost	TC Sangye status of net conservation benefit, substance of site plan agreements, focus on mandatory actions [1.7] read Webb email re map [1.1]; read/respond Joslin re call status call tomorrow, canal lining funding [1.3]; TC Sangye re monitoring requirements under CFR, no jeopardy finding [1.3]; research/write monitoring argument [1.8]	865.00	3.20		2,768.00

Date	Attorney	Description	Rate	Time	Omit	Amount
2/17/23	Frost	TC Sangye re status of his edits to brief, AR complete issue [.3] TC Webb re coho distribution, maps, state. diversion records, CA watermaster records, brief review [1]; receive Sangye edited version, review AR cites/accept via track changes, forward to Hawley [.7]; TC Sangye re ITS population argument; drafting no jeopardy, NEPA arguments [.4]; review Chesney email and bio materials, respond substantive part of relief dec [.4]; review Sweeney email re media [.1]; NEPA FONSI research and argument drafts [1.7]; email standing decs to McGinnis for format changes [.1]	865.00	4.70	0.10	3,979.00
2/19/23	Frost	Edit brief to date, comments, forward to Sangye [.8]; FONSI record research and argument drafts [1.9]; review Webb email CA state reporting [.1]	865.00	2.80		2,422.00
2/21/23	Frost	Review/respond Chesney re dec [.3]; review McGinnis re format standing decs, responses [.2]; calendar edits Joslin dec [.1]; research FONSI challenge flows, draft [1.2]; confer Sangye status of his review brief, no jeopardy argument, timing [.4]; read Webb email non Covered Area irrigated lands, read record, edit arguments [.9]	865.00	3.10		2,681.50
2/22/23	Frost	Status conference Sangye re remaining work; discuss NEPA draft, relief components, Joslin dec, relief decs, divide tasks [.9]; respond McGinnis re draft brief [.1]; read FWS Fed Reg proposed SHA regulations, confer Sangye same [.7]; read Sinkiyone case, recast portions of env baseline arg [1.2]; confer Webb re state water reporting [.2]; review/finalize map suggestions [.1]	865.00	3.20		2,768.00
2/23/23	Frost	Conferral Sangye SHA section, overhaul and restructure, edits [1.7]; Confer Webb re brief, enter some edits, check others [.7]; confer Chesney re brief, corroborate record cites, enter edits [.6]; respond Thayer re edits and next steps [.2]; overall read, finalize for tomorrow [.9]; check email, respond Grosko re AR addition [.1]; confer Webb re map, changes, dec re sources [.2]; confer Amber re final standing decs [.2]; confer Sangye re Joslin dec, changes [.2]; read Wheeler proposed changes/questions/edits, incorporate [.3]	865.00	5.10		4,411.50

Date	Attorney	Description	Rate	Time	Omit	Amount
2/24/23	Frost	Read updated draft SHA arguments, check legal citations, read case, edit [1.6]; TC Groske re supplementing AR [1]; read/respond Groske re same [1]; print out edits/questions brief as whole [1.7]; TC Webb re canal mileage, cites [1]; confer Sangye re status of brief, today's tasks [3]; consider relief, find cases, confer Sangye re approach, TC Bishop re same, finalize [4]; confer McGinnis tables [2]; read version, create Word documents [8]; read final draft Joslin dec, propose edits, confer Joslin re changes, finalize [7]; proof final [9]; confer Sangye signing [1]	865.00	7.70	1.00	5,795.50
2/28/23	Frost	Check court rules, Thompson standing order re courtesy copies [1]; confer Sangye re government response, timing of supplemental AR [2]	865.00	0.30		259.50
3/2/23	Frost	Read Sangye email cancel status call [1]; read clients' responses [1]	865.00	0.20		173.00
3/4/23	Frost	Review Groske email re supplemental AR docs, respond re timing [1]	865.00	0.10		86.50
3/6/23	Frost	Confer Sangye re relief, AR supplementation, client status call Thurs [3]	865.00	0.30		259.50
3/9/23	Frost	Confer experts re brief [3]; client status call [8]; receive, load, post supplemental AR [1]; review full comments, notes [1.6]; confer Sangye re same [2]	865.00	3.00		2,595.00
3/10/23	Frost	Read/respond Sangye re supp AR and docs [1]; read Can Fisheries Journal study CA returning spawners and age distribution, notes re relief [6]; confer client re regional board appointment, any ethical conflicts re case role as declarant, member [4]	865.00	1.10		951.50
3/16/23	Frost	Read Grosko email re changes to briefing schedule, forward to client for conferral [1]	865.00	0.10		86.50
3/19/23	Frost	Confer client, respond DOJ re changes to briefing schedule [1]	865.00	0.10		86.50
3/22/23	Frost	Email Grosko re response to new hearing proposal [1]; read Grosko email response [1]	865.00	0.20		173.00
3/23/23	Frost	Read clients' emails re call [1]; read Amber email re FOSR nomination [1]; read Eighth Circuit, Seventh Circuit cases re scope of take provision [1.1]; read Grosko email, check court and personal calendars, confer Sangye re shortening time, email courtroom deputy re "re-noticing," email Grosko propose hearing July 11 [6]; VM Sangye re calendar [1]	865.00	2.00		1,730.00
3/24/23	Frost	Read Sablefish ITP order [2]; check ECF parties' briefing on vacatur/relief, read docs [5]	865.00	0.70		605.50

Date	Attorney	Description	Rate	Time	Omit	Amount
3/25/23	Frost	Review entries court docket, calendar, prepare draft stip re hearing date, forward to Sangye for review [.4]; review proposed edits, incorporate, email to Grosko [.1]; email clients changes briefing schedule, proposed change hearing [.1]; review EPIC response [.1]; read Webb response, respond re number of attorneys [.1]	865.00	0.80		692.00
3/30/23	Frost	Email Kane re status of federal briefing, query re Montague waiver [.1]; calendar research tasks [.3]	865.00	0.40	0.30	86.50
4/3/23	Frost	Read Karrigan email, contemplate [.2]; consider CA state water data claim [.3]; consider vacatur vs injunctive relief, decs [.3]	865.00	0.80		692.00
4/5/23	Frost	Research framework opposition to vacatur, cases, burdens [.1.3]; TC Kimbrell Center for Food Safety re same [.2]; VM Eubanks re same and take case [.1]; TC Sangye re same, documentary/declarations in support [.3]	865.00	1.90		1,643.50
4/7/23	Frost	Read Eubanks email, DC Colo ITP case re differences ITPs and ESPs, relief, notes [.9]; review calendar next steps, calendar week Apr 10 [.1]	865.00	1.00		865.00
4/10/23	Frost	Research cases re binding nature/enforceability of SH policy [.1.4]; read FWS 2/9/23 proposed revision SH regulations, notes [.7]	865.00	2.10		1,816.50
4/12/23	Frost	Read all supplemental written comments, notes [.2.6]; email Webb re confirm accuracy of his comments [.1]; confer Kane, research re CA state water law re reporting/data [.1.1]; confer Sangye re DOJ hearing date changes, factors [.1]	865.00	3.90		3,373.50
4/14/23	Frost	Read Webb response draft dec map prep [.1]	865.00	0.10		86.50
4/17/23	Frost	Confer Webb re outmigrant, return data, AR; government brief [.3]; review Webb draft dec re map prep basis, email response [.2]	865.00	0.50		432.50
4/21/23	Frost	Read Ninth DCT cases re policies, rules, enforceability, standards [.1.9]	865.00	1.90		1,643.50
4/26/23	Frost	Reread DOJ SHA argument, frame and research possible avenues to response [.2.8]; conferrals Sangye re same [.3]; research NRDC EPA, River Runners, other cases [.1]	865.00	4.10		3,546.50
4/28/23	Frost	Read/research/prepare response 2017/2021 BiOps and take as to Montague [.2.9]; VM Sangye coordination [.1]	865.00	3.00		2,595.00
5/1/23	Frost	TC Sangye re status of research, Scalia concurrence re interpretive rules, independent tasks [.4]; TC Webb re two research tasks, timing [.3]; research AR, edit memo [.1.4]	865.00	2.10		1,816.50

Date	Attorney	Description	Rate	Time	Omit	Amount
5/2/23	Frost	Read NRDC v. EPA re interpretive rules, consider underlying docs, email Sangye re same [.9]; confer Sangye re issue and his reading different Ninth Cir case re rules/policies/enforceability [.4]; review AR and specific cites, edit/refine action area argument [1.9], email Webb for review [.1]; read/respond Webb email re Grenada diversion, data points, check AR, email back query [.4]	865.00	3.80		3,287.00
5/5/23	Frost	TC Sangye re enforceability argument, his review my second pivot response, timing [.4]; read Webb note re GID diversion, cfs figures, record problems [.2]; edit action area [.2]; read EPA/NRDC briefs re enforceability, email Kimbrell re same [.5]	865.00	1.30		1,124.50
5/8/23	Frost	Read Ninth, DCT, other federal appellate cases re relative probative weight peer-reviewed studies, edit temp brief argument re same [1.9]; read whole of 2008 CDFW WQ report to respond to NMFS's dated data point, edit argument re same [1.7]; TC Chesney re same, forward AR excerpts [.4]; read/respond Sangye email re rules interp write up, review tomorrow [.1]	865.00	4.10		3,546.50
5/9/23	Frost	TC Chesney re 2008 documents, smolt to adult survival ratios, brood year productivity, record search [.8]; read Chesney text re same and chart, query origin, numbers [.2]; TC Sangye re argument date [.1]; research edit substantive/interpretive rules and enforceability [1.9]	865.00	3.00		2,595.00
5/10/23	Frost	Emails Sangye coordination claims prep [.1]; complete draft leg rule/enforceability arguments [1.7]; begin draft violated Policy [1.4] TCs Bishop/McMillan re oral argument [.2]	865.00	3.40		2,941.00
5/11/23	Frost	Meeting Sangye status of arguments, standing, additional declarant, relief research [.5]; email Sangye Chesney materials [.1]; conference call clients re case, some arguments, evidentiary needs [.5]	865.00	1.10		951.50
5/12/23	Frost	Read CDFW Cal Coho Recovery Strategy AR 23037-23124 , notes [1]; edit action area, check cites re tailwater, correct [.4]; continue SHA violated argument [1]; TC Sangye re SHA enforceability argument [.3]; emails Webb re AR cite checking/proof [.3]	865.00	3.00		2,595.00
5/14/23	Frost	Strategize week work assignments [.3]; research and complete draft response to SHA policy complied with [2.6]	865.00	2.90		2,508.50
5/15/23	Frost	TC Chesney re outmigrant data, temps, Karuk comments, response re juvenile rearing [.4]; search/read AR cites re same [1.3]; meeting Sangye his prep standing response, Chesney dec, SHA enforceability, timing [.3]	865.00	2.00		1,730.00

Date	Attorney	Description	Rate	Time	Omit	Amount
5/16/23	Frost	Read NMFS ITS argument, notes [.3]; read AR 1123-64 & 711-808, notes [1.9]; draft response argument [1.9]; confer Sangye status jurisdiction response [.2]	865.00	4.30		3,719.50
5/17/23	Frost	Read AR cites and case research, complete final first draft ITS section, forward to Sangye for review, critique, edits [2.4]; read Sangye first draft standing response, read Ninth Circuit cases cited (and others), edit (shorten), return Sangye further review and answer queries [1.7]; draft 18C temperature efficacy response [.9]; confer Bishop no argument re vacatur, cases, forward [.3]	865.00	5.30		4,584.50
5/18/23	Frost	First read NMFS's NEPA arguments, initial case research re LaFlamme, significance, benefit/degradation [1.7]	865.00	1.70		1,470.50
5/19/23	Frost	Confer Eubanks re agency discretion when issuing permits, research write final draft SHA violated piece, to Sangye [2.6]; confer Sangye today's work/production schedule [.1], review/forward to Sangye final draft action area argument [.3]; read client emails re docs commented upon, links, agency fix to docs [.2]; confer Sangye and review second draft standing argument, edit and finalize [1.2]	865.00	4.40		3,806.00
5/20/23	Frost	Research and draft components of environmental baseline argument [1.3]; TC Sangye re same [.3]; email final drafts action area and temperatures to Sangye for review, covering queries re record and research needed [.3]; review and again edit SHP enforceability argument [1.1]	865.00	4.00		3,460.00
5/21/23	Frost	Review/edits SHP enforceability piece, reframe Friends DCT treatment [.5]; email Sangye gameplan for next four days, allotted tasks [.2]; research/compose first draft monitoring argument [1]; email draft to date to Wheeler [.1]	865.00	1.80		1,557.00

Date	Attorney	Description	Rate	Time	Omit	Amount
5/24/23	Frost	Research and draft three of four NEPA arguments, multiple conferrals w Sangye, researching EA/AR [2.6]; confer Webb re his recommended edits to brief, emphases [.4]; review/input some of his changes [.3]; confer Joslin re brief [.1]; confer Chesney re brief and temps response, other issues [.2]; read full draft brief, round of edits, note research needs [.7]; read Amber proposed edits, incorporate [.2]; confer Sangye re latest iteration, his edits, recommended removal footnotes, Skidmore argument, Handbook differences, deference to both, changes [.4]; research and draft fourth NEPA argument re EA [.6]; third, fourth, fifth edits to brief, review/respond clients' input re iterations, multiple conferrals Sange, finalize for tables [1]; TC Sange re proposed order, forward [.1]; respond client re filing tonight [.1]; TC Sangye re status of filing [.1]	865.00	6.80		5,882.00
5/25/23	Frost	Check ECF, text/TC Sangye re brief [.1]; email Grosko/Hannah re motion re day late, prepare [.1]; confer Sangye re filing [.1]	865.00	0.30	0.30	-
5/26/23	Frost	TC Sangye re no court order re extension [.1]	865.00	0.10		86.50
5/30/23	Frost	Read emails between courtroom deputy and Sangye [.1]; confer Sangye re same [.1]	865.00	0.20		173.00
6/1/23	Frost	Conference/status call clients, co-counsel [.4]	865.00	0.40		346.00
6/4/23	Frost	Reread Home Builders and NW Ecosystem Ninth Cir cases, outline/draft text for SHP origin, statutory authority, force and effect [2.6]	865.00	2.60		2,249.00
6/5/23	Frost	Read CBD v Haaland re ESA recovery plans and reviewable final agency actions, notes [.7]; read handbook provisions, check w Sangye re errors, confer re errata, draft, e-file [.7]; ensure Ecology Center cite, read Lands Council re same soil standard [.4]; reread NRDC v. EPA, login parties' appellate briefs re any assertion binding/no force effect of Cancer Guidelines [.5]	865.00	2.30		1,989.50
6/6/23	Frost	Read/respond Cal Cares re media call [.1]	865.00	0.10	0.10	-
6/7/23	Frost	Oral arg prep re SHP enforceability; jurisdiction [1.9]	865.00	1.90		1,643.50
6/9/23	Frost	Email Kloepper re Firedoll and oral arg [.1]	865.00	0.10	0.10	-
6/9/23	Frost	Read Upper Green River ESA BiOp/ITS Tenth Cir, consider re supplemental authority [.4]	865.00	0.40		346.00
6/24/23	Frost	TC Wheeler standing declarants, body of evidence, pronunciations [.2]; multiple conferrals Sangye; research and prepare responses/outline of jurisdictional issues for oral argument [4.9]	865.00	5.10		4,411.50
6/25/23	Frost	Travel EUG to SFO [3.5]	865.00	3.50	1.75	1,513.75
6/26/23	Frost	Oral argument prep courthouse attorney lounge [5.9]	865.00	5.90		5,103.50

Date	Attorney	Description	Rate	Time	Omit	Amount
6/27/23	Frost	TC Bishop re hearing [.1]; to Hastings, document prep [.5]; oral arg prep at courthouse [3.7]; hearing [1.5]; email clients re hearing update [.2]; SFO to EUG [3]	865.00	10.30	2.00	7,179.50
7/1/23	Frost	Billing for trip [.3]	865.00	0.30	0.30	-
7/3/23	Frost	TC Hawley re hearing, lateness, firm review [.2]; read Ninth Cir BMBP case re NEPA challenge to FONSI, confer Sangye re any 28j letter [.5]	865.00	0.70	0.30	346.00
7/11/23	Frost	Read ECF court order and judgment [.4]; read FRCP calendar Rule 59 and appeal deadlines [.1]; TC Sangye re initial read [.4]; TC Wheeler re same [.1]; TC Webb re same [.1]; TC Hawley re same and ESP permits [.3]; conferrals re media [.2]; arrange client call tomorrow [.1]; emails potential experts [.2]; confer tribal reps, TC same [.3]	865.00	2.20	0.20	1,730.00
7/12/23	Frost	TC Webb 2020-2022 adult return, outmigrants, temp/flow data within enrolled properties; claims and relief; Aug strategy meeting; client call today [.7]; read LR re 59(e) substance/timing [.1]	865.00	0.80		692.00
7/17/23	Frost	Read Fruitgrowers remedy opinion/order, read parties' briefs in that case, read underlying cases, notes [1.3]; TC Webb re dropbox data, lack of specifics at downstream border, closest accurate data at A-12, scope of inquiry [.4]; read/respond Kane re call Wed [.1]	865.00	1.80		1,557.00
7/19/23	Frost	Review WDR docs, Coastkeeper case re exhaustion, notes [.8]; TC Kane re Montague and WDRs [.6]; agenda tomorrow client call [.1]; read Webb emails re case result [.2]	865.00	1.70	1.40	259.50
7/20/23	Frost	Case research vacatur BiOp and internal ITS [1]; same re EA and evaluated (permitted) activities [1.1]; TC Sangye re position to take in opening motion, case results [.3]; prep for client status call [.1]; client status call, answer questions, informational/data needs, declaration [.9]; notes re same and next steps [.2]	865.00	3.60		3,114.00
7/21/23	Frost	Re-read order, Ds' open/reply brief, table 19, subset six categories [.4]; TC Webb re same, identifying specific beneficial projects to exempt [.8]; research/edit text/framework 59(e) motion [1]; respond client re Karuk interest, any preclusion from settlement agreement [.3]; confer McBain re call next week, set [.1]	865.00	2.60	0.10	2,162.50
7/24/23	Frost	Read Scott email re low threat discharge permit, respond [.1]; read Chesney response CPSA [.1]; final edits State Water Board letter, email to clients for review [.3]; edits Chesney dec 59(e) [.5]	865.00	1.00	0.30	605.50
7/25/23	Frost	Read client response MWCD protest update circulation [.1]	865.00	0.10	0.10	-

Date	Attorney	Description	Rate	Time	Omit	Amount
7/26/23	Frost	TC McBain re water issues, tribal work, next steps [.7]; confer Webb re same [.3]; proposed edits Chesney dec [.9]; review/respond Hunt re rescheduled call [.1]; TC Hunt re flows petition [.9]	865.00	2.90	0.90	1,730.00
8/1/23	Frost	Research/edit/work up 59(e) motion, to Wheeler for review [.4]; multiple TCs, emails Webb re data, reports [.7]; finalized prospective draft Chesney dec [.9]; forward Webb/Chesney for review [.1]; review emails re flows, WDRs, propose email subjects/compartimentalization [.3]; confer Sangye re attorney client parameters, concerns [.2]	865.00	3.60		3,114.00
8/3/23	Frost	Confer Chesney re dec changes, Parks Creek inclusion, whether permits/funding needed for projects [.7]; status call clients re 59(e) motion, strategy meeting re appeal and remand tasks [.8]; draft invitees and agenda [.4]; respond Tucker re Karuk attendance [.1]; TC Bishop re his read 59(e) [.1]; TC Hawley re his read tomorrow [.1]	865.00	2.20		1,903.00
8/4/23	Frost	Read/incorporate Webb comments motion and Chesney dec [.2]; read Hawley email re same [.1]	865.00	0.30		259.50
8/10/23	Frost	Read Groske response joint extension motion, reply [.1]; counsel/client status call [.9]	865.00	1.00		865.00
8/14/23	Frost	Read ECF order granting extension [.1]	865.00	0.10		86.50
8/29/23	Frost	Read 2023 NMFS annual report, notes [.9]; read MWCD excel docs, notes [.8]; VM Webb re same [.1]; TC Webb re same; flows petition; NMFS appeal [.8]	865.00	2.60		2,249.00
9/14/23	Frost	Confer Hawley re NMFS brief, response [.2]; confer Sangye re same, approach [.2]; research and draft opening components of reply [1.9]; forward NMFS materials to clients with explanation [.1]	865.00	2.40		2,076.00
9/21/23	Frost	Read Helena Hunters, docket entries, edit 59(e) legal standard argument [1]; TC Sangye re client call today [.1]; review government papers [.2]; status call clients [.9]	865.00	2.20		1,903.00
9/26/23	Frost	Read Simondet dec, notes, check AR and website re reps re Klamath project [1.4]; confer Chesney re representations, potential responses [.6]; research 59(e) preclusion argument and cases [.9]; read Webb response re Simondet dec, NMFS opposition [.3]	865.00	3.20		2,768.00
10/2/23	Frost	Multiple client, declarant, attorney conferrals/reviews/edits to 59(e) motion and accompanying docs; finalize reply; [2.8]; e-file [.1]	865.00	2.90	0.10	2,422.00
10/23/23	Frost	Check court calendar, scheduling notes re hearing next week [.1]	865.00	0.10		86.50
10/30/23	Frost	Prep for hearing tomorrow [1.1]; read ECF cancelling same [.1]; confer Sangye re same, email clients re same [.1]	865.00	1.30		1,124.50

Date	Attorney	Description	Rate	Time	Omit	Amount
11/15/23	Frost	Email clients re no ruling on 59(e) motion cancel status call tomorrow re-schedule after Thanksgiving [.1]	865.00	0.10		86.50
11/30/23	Frost	Review Wheeler email absent [.1]; status call clients [.5]; notes on call and prospective WDR case [.2]	865.00	0.80		692.00
12/7/23	Frost	Review/respond client re no status call [.1]; read Ninth Cir opinion re BiOp remand, query Sangye re remand rule application [.3]	865.00	0.40		346.00
12/14/23	Frost	Read clients' emails unavailability re status call today [.1]; read Wheeler email re state appellate SHA argument [.1]; respond query link [.1]	865.00	0.30		259.50
1/8/24	Frost	Consider means of finessing ruling on 59(e) motion, review projects list, check web as to any development/funding requests, email clients re same and updates [.7]	880.00	0.70		616.00
1/12/24	Frost	Confer Wheeler re state SHA oral argument [.2]; read Stokely post \$2 million for Shasta projects, read requests, confer clients [.3]	880.00	0.50	0.20	264.00
1/17/24	Frost	Check NDCA website SHA oral arg, email Wheeler re same [.1]; read response [.1]	880.00	0.20		176.00
1/19/24	Frost	Read Stokely post State Water Board drought report, CEQA analysis [.2]	880.00	0.20	0.20	-
1/23/24	Frost	Read 59(e) order, email WELC attorneys re same, email clients re same, read responses [.5]; consider next steps [.4]; calendar appeal deadline [.1]; TC Hawley re Alsea Valley and rule [.3]	880.00	1.30		1,144.00
1/25/24	Frost	Status call clients re court 59(e) order, joint status reports, contents and data; opportunities; possible appeal; next steps re flows [1]; consider same and remand rule [.4]	880.00	1.40		1,232.00
1/26/24	Frost	Read Wheeler email, Cal state appellate court marten safe harbor ruling [.7]	880.00	0.70	0.70	-
2/1/24	Frost	Respond clients no call today [.1]; email clients Murphy link [.1]; confer donor re FOSR [.1]	880.00	0.30	0.10	176.00
2/8/24	Frost	Status conference call clients [.5]	880.00	0.50		440.00
2/12/24	Frost	Check 59(e) order cases, read SCOTUS re same, calendar any appeal deadline [.2]	880.00	0.20		176.00
2/14/24	Frost	Read Stokely email re \$72 million IRA funding, terms [.1]; email clients re status call postponed until next week [.1]	880.00	0.20	0.10	88.00
2/21/24	Frost	Review Webb, Joslin emails re TMDLs, state board response; set up Zoom call [.2]; Conf call Webb, Joslin re TMDL processes, WDRs, flow petition denial (meeting tomorrow), state SHA concurrences, appeal [1.3]; set up status call tomorrow [.1]	880.00	1.60	1.60	-
2/22/24	Frost	Read/respond Joslin re call today [.1]; respond Drevet re flow petition denial call [.1]; conference call state board, clients re denial of Shasta instream flow petition [1]; conf call clients re same, appeal, TMDLs, data for June progress report [.8]	880.00	2.00	2.00	-

Date	Attorney	Description	Rate	Time	Omit	Amount
2/23/24	Frost	Conference call Drev/associate re flow petition denial, next steps [.8]	880.00	0.80	0.80	-
3/3/24	Frost	Read/respond Webb re cancel status call this Thurs reschedule re appeal next [.1]	880.00	0.10	0.10	-
3/19/24	Frost	VM Peppin USDOJ [.1]; confer Sangye re prophylactic appeal, claims [.1]	880.00	0.20	0.20	-
3/21/24	Frost	TC Chesney re CDFW curtailment fish presence, annual report [.2]; status call clients re appeal, updates [.5]; TC Sangye re notice of appeal [.1]	880.00	0.80	0.80	-
3/22/24	Frost	Notice of appeal, forward to clients [.1]	880.00	0.10	0.10	-
3/26/24	Frost	Read ECF re appellate case file [.1]; read ECF re corrected linking [.1]; calendar mediation and brief dates [.1]	880.00	0.30	0.30	-
3/28/24	Frost	Review/respond Webb re agenda status call today [.1]; TC Webb re legal tasks, appeal, curtailment order, July status report, data and next steps [.7]	880.00	0.80	0.80	-
4/4/24	Frost	Calendar mediation email due date [.1]; read ECF order re appellate jurisdiction, briefing [.1]; read ECF NMFS cross-appeal [.1]; email clients re same [.1]; read data on Klamath basin Chinook returns/projections [.3]	880.00	0.70	0.70	-
4/5/24	Frost	Read ECF re NMFS notice of appeal [.1]	880.00	0.10	0.10	-
4/8/24	Frost	Appellate mediation message [.1]; confer clients on same, cross-appeal, pending projects, data needs [.5]; read email responses [.1]	880.00	0.70	0.70	-
4/9/24	Frost	Read ECF USDOJ notice appearance [.1]; read ECF Ninth case management [.1]	880.00	0.20	0.20	-
4/11/24	Frost	Read Karuk query re water rights protest and Dwinnell dam permit; read docs, respond same re April 22 [.7]; read article closure CA salmon season [.2]; confer Joslin re flushing flows, timing, bank remediation, regional board parameters [.4]	880.00	1.30	1.30	-
4/22/24	Frost	Ninth Circuit mediation call [.5], read/respond expert re billing, call [.1]; read/respond Hutchison re brief [.1]; read client email, Cong Chavez letter [.1]	880.00	0.80	0.80	-
4/23/24	Frost	Email Mediation office re Apr 29 call [.1]; read response [.1]; read ECF notices [.1]; appeal research, new FWS SH regulation, read prior draft, seek Fed Reg comments [1.9]	880.00	2.20	2.20	-
4/24/24	Frost	Check ECF, email mediator re opening brief due date [.1]; read State Board response Konrad MWCD protest, email clients re NPDES permit [.2]; email Konrad re VM and TC openings [.1]	880.00	0.40	0.40	-
4/25/24	Frost	Review/respond mediator re opening brief deadline [.1]; read Webb response re MWCD protest reply [.1]; read Joslin response re same [.1]	880.00	0.30	0.30	-
4/26/24	Frost	Prepare concise fact background; review AR sections [1.9]	880.00	1.90	1.90	-
4/29/24	Frost	Read ECFs re new DOJ appellate attorney [.1]	880.00	0.10	0.10	-

Date	Attorney	Description	Rate	Time	Omit	Amount
4/30/24	Frost	TCs Webb re State Board/regional board temp and discharge requirements, documents [.4]; notes re different discharges SH v NPDES permit, timing, monitoring [.7]	880.00	1.10	1.10	-
5/1/24	Frost	Read SWRCB rules re protests and responses, evidence; notes; TC Webb re same and available data [.5]	880.00	0.50	0.50	-
5/2/24	Frost	Conf call Joslin, Webb re SB protest response, extension, specifics [.9]; read SH AR for data, check Montague settlement terms, re-read temp papers [1.4]	880.00	2.30	2.30	-
5/3/24	Frost	Research temp/flow data from MWCD releases/Seldom Scene monitoring to respond State Board query [.1]	880.00	0.10	0.10	-
5/16/24	Frost	Appellate opening brief background section review, AR cites, edits, narrative [1.6]; read client email re NMFS staff changes, respond [.1]	880.00	1.70	1.70	-
5/20/24	Frost	Read/respond Ninth Cir mediator re call Thurs [.1]	880.00	0.10	0.10	-
5/22/24	Frost	Read/respond Saltiel re mediation call tomorrow [.1]	880.00	0.10	0.10	-
5/23/24	Frost	Confer Rue re filing, work up docs [.1]; confer Karli re remand rule issue and research [.2]; 9th mediation office call [.5]; confer Rain re opening brief, excerpts of record; email examples [.2]	880.00	1.00	1.00	-
5/28/24	Frost	Draft background sections opening brief [1.6]; email clients re status report, data needs call [.1]; email USDOJ re same and proposed stip re extension [.1]	880.00	1.80	1.80	-
5/29/24	Frost	Confer clients re call re joint status report [.1]; email Ninth Cir mediator re schedule/terms of any settlement [.1]; research and draft SHP enforceability argument [1.9]; read Grosko response re conferral on status report [.1]	880.00	2.20	2.20	-
5/30/24	Frost	Set up client Zoom call [.1]; confer Rain re excerpts, court orders, likely volumes, timing [.3]; Zoom call clients re joint status report, data collection, monitoring stations, Del Campo ranch exiting SH, sale of other ranch to TNC; Big Springs ranch management [1.2]; notes re same and next steps [.2]	880.00	1.80	1.80	-
5/31/24	Frost	Read Karli memo re remand rule [.2]; TC Karli re same, prongs [.1]; review/respond Rain ER and pagination [.1]; respond Ninth Cir mediator re status, opening brief deadline [.1]	880.00	0.50	0.50	-
6/3/24	Frost	Read Ninth Cir mediator email re response re settlement, release [.1]; read follow-up re USDOJ concurrence extension [.1]	880.00	0.20	0.20	-
6/5/24	Frost	Prepare NMFS permitting history, assumptions, DCT arguments and treatment [1.7]; confer Rain re ER, check Ninth Cir rules re form, edits [.4]	880.00	2.10	2.10	-

Date	Attorney	Description	Rate	Time	Omit	Amount
6/6/24	Frost	Edits/cite checking/AR checking jurisdiction, issues, fact, proceedings sections opening brief [1.7]; edits SH argument [1.2]; read Grosko email re joint status report extension [1]; read Yowell email re conferring re appeal [1]	880.00	3.10	3.10	-
6/8/24	Frost	Review/respond Yowell re call [1]; email clients expected draft [1]; research agencies' general statutory authority to promulgate rules; read Bork article re same [1.9]; work up revisions of Friends case in contexts of both enforceability and applicability arguments [1.3]; edit SHP as applied argument one [8]	880.00	4.20	4.20	-
6/9/24	Frost	VM Hawley re status of draft opening brief, review Tuesday [1]; read Chesney dec, incorporate background changes [3]; shorten/precise fact section, population data [5]; edit enforceability arg [7]; check record cites, edit second SHP infirmity [8]; baseline argument [1.2]; check Grosko email, read LR, prepare joint status report stip and declaration, email [6]	880.00	4.20	4.20	-
6/10/24	Frost	Research and edit third SHP argument re Section 10(a)(1)(A) [1.3]; meeting Rain re excerpts [2]; TC Ninth Cir re same for website citations [2]; TC Hawley re brief review [1]; TC Wheeler re same [1]; edit brief [1.9]; draft fourth SHP argument [6]	880.00	4.40	4.40	-
6/11/24	Frost	Text edit entire draft brief to date, changes [8]; email to Hawley for review w cover [1]; email to clients for review dif cover [1]; email to Wheeler for review dif cover [1]; cover Rain re ER and AR, download [2]; confer Karli re cite check all legal citations [1]; TC Yowell USDOJ re cross-appeal, position on motion for judicial notice [1]; confer Karli re same and professional conduct [1] read rules, cases, compile motion, email to Yowell [1]; email Court's 4/2 order to Hawley [1]; re DCT case, read Grosko email, edit stip re extension, file [1]; review Wheeler recommended edits to draft opening brief, incorporate [9]; TC Karli re cites, leg hist, fixes; incorporate [3]; read clients' recommended changes to draft brief, check AR, incorporate [1.2]; read Hawley email his review, VM same, text same tomorrow [1]; add standing dec testimony [1]	880.00	7.00	7.00	-
6/12/24	Frost	Conferrals Rain re ER [6]; TC Ninth Cir clerk re same [2], VM/TC Hawley re his edits, substantive changes [3]; emails Karli re cite form and substantive issues [3]; forward brief out to attys and Rain re issues [1]	880.00	1.50	1.50	-

Date	Attorney	Description	Rate	Time	Omit	Amount
6/13/24	Frost	Edits brief to date, Condor addition, DCT briefing addition [1]; email to Hawley, review response his review [1]; read Yowell email, respond [1]; edit motion judicial notice, prepare dec [2]; TC Webb re NMFS annual SH report [1]; confer Rue re AR excerpts in ER [2]; TC Ninth Circuit clerk re same [1]; multiple conferrals Rue, Uwayne re text and ER composition and edits [9]; review draft ER citations, cross-reference AR for accuracy, input [2.4]	880.00	4.00	4.00	-
6/14/24	Frost	Print, check AR, check cases edit draft brief to date [9]; read rules Addendum, prepare, travel Kinkos, PDF, paginate, TOC [1]; review tables to date, check cites, multiple edits, conferrals [9]; piece together omnibus brief, edit, incorporate Karli edits [1.8]; TC Ninth Cir re addendum attached or detached [1]; word count differences, rectify [2], publish docs for filing [3]; efilng [2]; email to clients w cover [1]	880.00	5.50	5.50	-
7/9/24	Frost	Read/respond Grosko re status call re status report [1]; confer clients re information/data [1]; appeal: read ECF paper copies filed [1]; read ECF appellants extension, calendar [1]; confer Rue re same [1]; conf call Grosko et al re status report [1]; email/TC clients re flow temp return data, read preliminary same [3]; read Grosko email re NMFS annual report [1]; read report, forward clients [4]	880.00	1.40	0.30	968.00
7/10/24	Frost	Multiple calls client, web research, draft fish and flow temp addition to status report [4]; track change edit to doc, forward to Grosko [1]	880.00	0.50		440.00
7/17/24	Frost	Read ECF notice appearance Kang [1]	880.00	0.10	0.10	-
8/14/24	Frost	Confer Yowell re dismissing cross appeal [1]; read ECF motion re same [1]	880.00	0.20	0.20	-
8/20/24	Frost	Read ECF order granting motion dismiss cross-appeal; confirming date optional reply [1]	880.00	0.10	0.10	-
8/23/24	Frost	Read ECF ND Cal dismissal cross appeal [1]	880.00	0.10	0.10	-
9/3/24	Frost	TC Ninth re streamline brief request, calendar [1]	880.00	0.10	0.10	-
9/24/24	Frost	Read ECF court notice oral arg span SF [1]	880.00	0.10	0.10	-
10/3/24	Frost	Read ECF 28j letter from NMFS and attachment [2]	880.00	0.20	0.20	-
10/9/24	Frost	Read part of NMFS answering brief (thru pp 29), notes [9]; email clients re permit position [1], TC Wheeler re same [3], TC Sangye re same, enforceability [2]; consider options re DCT/influence on oral argument, TC Hawley re same [1.4]; conference call Drev Hunt, Cody Phillips re state board instream flows, ESA angles [8]	880.00	3.70	3.70	-

Date	Attorney	Description	Rate	Time	Omit	Amount
10/10/24	Frost	TC Bishop re NMFS answering brief concession, strategy [.3]; read CBD v. Bernhardt, red CBD v. BLM, respond Bishop re ROD and approval w/ court order specificity; research approaches [2.3]	880.00	2.60	2.60	-
10/11/24	Frost	Research district court/appellate court jurisdiction re 59e, 61, 62 [1.2]	880.00	1.20	1.20	-
10/28/24	Frost	Research Sierra Legacy case, headnotes, other Ninth and D.C. Circuit cases, all re remand rule and exceptions [2.7]; confer Karli re same [.2]; TC Kimbrell re possibilities [.2]; draft response args [.6]	880.00	3.70	3.70	-
10/29/24	Frost	Compile SSER docs from filed docs [.4]; complete draft reply argument summary, injury, factual corrections [1.3]	880.00	1.70	1.70	-
10/30/24	Frost	Reply brief: draft aggrieved response [.7]; read Electus Parrots, River Runner, draft components of enforceability response [1.8]	880.00	2.50	2.50	-
10/31/24	Frost	Meeting Rain SSER, forward docs, confer re rules and authentication [.4]; draft components enforceability [1.9]; proof and add cites existing brief to date [.6]; draft components violation [1.6]	880.00	4.50	4.50	-
11/1/24	Frost	Meeting Rain re SSER [.2]; forward docs [.1]; confer re same and EA, tables Monday [.1]; research/contact Tullos re Klamath salmon research [.3]	880.00	0.70	0.70	-
11/4/24	Frost	Draft remaining components of reply brief re enforceability and violation [2.6]; multiple record, case, and text edits [.8]; confer Rue re tables [.1]; review Rue email re cite form, record cites, correct [.2]; complete and e-file brief and SSER [.9]	880.00	4.60	4.60	-
11/5/24	Frost	TC Wheeler re Quartz Valley, Karuk, PCCFA views and representation [.5]; read ECF Ninth re filing [.1]	880.00	0.60	0.60	-
11/7/24	Frost	TC court clerk filed vs printed copy of reply [.1]; confer Karli re mistake [.1]	880.00	0.20	0.20	-
11/14/24	Frost	Read ECF received paper copies reply SSER [.1]	880.00	0.10	0.10	-
11/18/24	Frost	Read Konrad email re general meeting [.1]; read Phillips response, respond [.1]; calendar meetings [.1]	880.00	0.30	0.30	-
11/25/24	Frost	Read ECF calendar appellate oral argument [.1]	880.00	0.10	0.10	-
12/1/24	Frost	TC Wheeler re Dec strategy meeting, meeting w Karuk [.2]	880.00	0.20	0.20	-
12/3/24	Frost	Work through meeting/case/reg notes, compile initial issues list and needs [1]; read Grosko email re status report [.1]	880.00	1.10	1.00	88.00
12/6/24	Frost	Email Grosko re status of NMFS assessment of project completion [.1]; review Webb's edits task/issues sheet, incorporate, edits [.8]	880.00	0.90	0.80	88.00

Date	Attorney	Description	Rate	Time	Omit	Amount
12/19/24	Frost	Read Grosko email re proposed joint report, leave date; respond [.1]; email Webb, TC Webb re project status, fish returns/outmigrants, data for joint report [.5]; TC expert re historic conditions/numbers, databases [.3]; read July status report, cf Grosko draft, email Grosko re permit representation and appellate statements [.4]; email Webb queries re 2024 data and median temp/flow info [.2]	880.00	1.50		1,320.00
1/6/25	Frost	Review documents, conference call clients, tribal staff re state water board meeting tomorrow, prep; minimum vs recovery flows; methodologies; hiring experts [2.1]; TC Bishop, research historic flows legal issues, TCs and emails Webb re same, monitoring sites criteria, and locations [1.2]	895.00	3.30	3.30	-
1/8/25	Frost	Review documents; TCs/conferrals Chesney/Webb historic flows mapping/locations [1.8]; TC Webb re locations, confidentiality [.3]; review final map, draft covering email [.2]; confer Fisher re experts, funding [.3]; VM McCarthy re Dwinnell alt [.1]; email Wright re same [.2]	895.00	2.80	2.80	-
1/13/25	Frost	Email Spain re fisheries cost benefit analysis [.1]; VM Webb re upstream Dwinnell [.1]; read/respond Amber re SHA scoping call tomorrow, consider issues re same [.4]	895.00	0.50	0.50	-
1/15/25	Frost	Appeal: confer Rain re CMEC v ACMS [.1]; read email, file acknowledgment [.1]; Ongoing: read/respond Konrad re expert call Friday [.1]; research record, draft components of responses to NEPA scoping inquiries [2.8]	895.00	3.10	3.10	-
1/22/25	Frost	Read ECF appellate oral argument notice [.1]	895.00	0.10	0.10	-
1/27/25	Frost	Research Moyle methodologies, tiers; email clients re Tier III and recovery flows [2.6]; hotel reservation appellate argument, confer Prill re same [.3]; TC Bishop re panels [.2]	895.00	3.10	3.10	-
1/30/25	Frost	Read/respond Ninth Cir clerk re oral arg [.1]	895.00	0.10	0.10	-
1/31/25	Frost	TC Hawley re Friday argument, panel [.1]	895.00	0.10	0.10	-
2/4/25	Frost	Oral argument prep [3.2]; VM Hawley re strategy [.1]; email USDOJ re call tomorrow [.1]	895.00	3.40	3.40	-
2/5/25	Frost	TC Yowell re argument, parties' positions, evidence [.2]; TC Hawley re same [.3]; read his email response [.1]; research cases re disposition on parties' agreement [2.8]; prep for oral argument script [1.1]; conference call water flow experts / clients re Tier III flows, recovery flows, historic data, next steps [1]	895.00	5.30	5.30	-
2/6/25	Frost	Oral argument prep, travel/flight delays [7]	895.00	7.00	7.00	-
2/7/25	Frost	Prep for argument [1.2]; print script [.2]; travel to courthouse, retreat before hearing [.9]; hearings [.7]; travel to hotel [.3]; confer Bishop, Hawley, clients re argument [.7]	895.00	4.00	4.00	-
2/8/25	Frost	Travel SFO to EUG [3.5]; billing, timeslips [.3]	895.00	3.80	3.80	-

Date	Attorney	Description	Rate	Time	Omit	Amount
2/10/25	Frost	TC McMillan re oral argument [.2]; TC Bishop re 28(J) letter [.1]	895.00	0.30	0.30	-
2/12/25	Frost	Read ECF, Ninth Cir order [.1]; email to clients w explanation [.2]	895.00	0.30	0.30	-
2/20/25	Frost	Read/respond Lacy re EAJA first filing Ninth or DCT [.1]; second response re DCT / Ninth jurisdiction [.1]	895.00	0.20		179.00
3/3/25	Frost	TC Ninth Cir clerk re mandate [.1]	895.00	0.10		89.50
3/16/25	Frost	Read Marx email / photo re Little Springs Creek impoundment; read CDFW Big Springs Cr Ranch permit; respond Marx et al re permit terms; email Webb/Joslin re call, issues, clarification, permit terms [1.2]; email Prill/Scoble re timesheets [.1]; update personal declaration [.6]	895.00	1.90	1.20	626.50
3/17/25	Frost	Check rules, TC court clerk, calendar judgment/mandate/fee motion deadlines, confer Karli re same [.2]; update resume w case citations, parentheticals [.8]	895.00	1.00		895.00
3/21/25	Frost	Confer Prill re timesheets [.1]; review same re form, email staff re timing [.1]	895.00	0.20		179.00
3/30/25	Frost	Check Ninth Cir ECF re any mandate [.1]	895.00	0.10		89.50
3/31/25	Frost	TC Bishop re Family Farm direct review rates [.2]; caselaw research re same [1.9]; email Lacy re same, read respond [.1]	895.00	2.20		1,969.00
4/2/25	Frost	Read/respond Rue re bill of costs deadline [.1]; read/respond Bishop re motion inclusion [.1]; confer ESG re fee declarants [.1]; email Sangye re timing and fee dec [.1]; multiple conferrals Shute Mihaly re forum rates, reasonable time [.2]; research ND Cal cases re same [1]; email Rue re National Law survey [.1] draft components of motion [1]	895.00	2.80		2,506.00
4/7/25	Frost	Read Ninth ECF entry mandate [.1]	895.00	0.10		89.50
4/7/25	Frost	Fees motion prep: detail case proceeding, from onset through Ninth [1.9]; confer Karli re same, and argument sequence [.1]; read Sangye email re updated dec, read same, respond [.3]; confer Wilcox re rates in forum [.2]; confer Lacy re flat vs staggered rates in Ninth [.1]	895.00	2.60		2,327.00
4/8/25	Frost	Email Paul Hastings re day/time to talk [.1]; confer Karli re rates [.1]; research ND Cal rates [1]	895.00	1.20		1,074.00
4/10/25	Frost	Conferrals/case research flat vs staggered rates [.7]; TC Parent re same and National Family Farm litigation, DOJ theories [.4]	895.00	1.10		984.50
4/11/25	Frost	Read ECF Grosko substitution [.1] confer Parent re same [.1]; confer clients re same [.1]; review/suggest edits Wheeler draft dec [.2]; review/suggest edits Joslin draft dec [.1]	895.00	0.60		537.00
4/14/25	Frost	Fees: check Ecological Rights ECF re order [.1]; draft substantial justification re NEPA [1]; add Ninth Cir cite re special circumstances [.1]	895.00	1.20		1,074.00

Date	Attorney	Description	Rate	Time	Omit	Amount
4/15/25	Frost	Review and edit draft fees motion to date, ensure accuracy of all case, record, exhibit cites [1.4]	895.00	1.40		1,253.00
4/17/25	Frost	Confer Lozeau re declaration [.2]; check ECF re ND Cal fees order [.1]; timesheets edits/omissions [.8]	895.00	1.10		984.50
4/18/25	Frost	Email USDOJ to confer on motion, joint motion to stay [.1]; TC Sangye re status of motion, timesheets, rates research, conferral, timing of completion [.4]	895.00	0.50		447.50
4/21/25	Frost	Complete review all decs and timesheets [.4]; final edits motion [.4]; read/respond Furlong DOJ re timing, joint motion stay [.1]	895.00	0.90		805.50
5/1/25	Frost	Confer Lozeau re timing of his declaration [.1]	895.00	0.10		89.50
5/2/25	Frost	Proof and e-file documents [1]	895.00	1.00	1.00	-
For Professional Services: Peter M.K. Frost				757.20	187.40	486,906.75

Total Hours	757.20
Total Hours Omitted	187.40
Total Hours after Omissions	569.80

Total Attorneys' Fees **486,906.75**



Superior Court of California County of Kern

Metropolitan Division
1215 Truxtun Avenue, Bakersfield, CA 93301

Date: 03/06/2025

Time: 8:00 AM - 5:00 PM

BCV-15-101645

VAQUERO ENERGY VS COUNTY OF KERN

Courtroom Staff

Honorable: Gregory Pulskamp
Division J

Clerk: Robin L. McDonald

NATURE OF PROCEEDING:

Ruling on Petitioners' Motions for Attorneys' Fees; heretofore submitted on February 19, 2025.

RULING:

For the reasons set forth below, the Court grants in part Petitioners' Motions for Attorneys' Fees.

DISCUSSION:

I. California Independent Petroleum Assn., et al., Real Parties in Interest ("RPIs") Request for Judicial Notice (RJN) in Support of Opposition to Motions

RPIs request that the Court take judicial notice, under Evidence Code section 452(d) and (h), of the Declaration of attorney Eric Moorman made in Opposition to both Motions for Attorneys' Fees, (Exhibit 1) and Judge Bradshaw's October 6, 2020 ruling on the prior Motions for Attorneys' Fees in this case (Exhibit 2). Evidence Code section 452(d) provides that judicial notice may be taken of records of any court of this state. Section 452(h) allows a court to take judicial notice of facts not reasonably subject to dispute.

Ruling: Granted. Both documents are the proper subject of judicial notice. No opposition to the RJN was filed.

II. V Lions Farming's ("VLF") Motion for Attorneys' Fees and Expenses

A. Amount of Fees Requested:

The attorneys' fees requested are based on a lodestar of \$2,476,315.50, covering a total of 3,110.5 hours worked. VLF "seeks recovery of \$3,714,473.25 in attorneys' fees (lodestar plus 1.5 multiplier) for the work of its counsel at Shute, Mihaly & Weinberger ('SMW') in successfully prosecuting this lawsuit. VLF also seeks \$5,360.85 for recoverable out-of-pocket expenses..." (Motion, p. 6, lines 17-21; Hooper

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Decl., para. 67). Further, VLF claims to have spent 231.7 hours for work on this Motion and therefore requests an additional \$190,601.00 in attorneys' fees. (Hooper Reply Decl., Exhibit Q). The grand total requested is \$3,910,435.10. (Reply brief, p. 26).

Attorney Rachel Hooper is the lead attorney for the SMW law firm in this case. She billed the most of any attorney from the firm. She oversaw this matter during each phase: administrative, trial court, appellate court, and remand proceedings. She also supervised all SMW attorneys, paralegals, law clerks, and other personnel. (Hooper Decl., para. 9-10).

She claims to have "written down" "significant amounts of attorney and planner time spent during the administrative proceedings," as well as "[s]ignificant amounts of attorney time spent drafting briefs and other pleadings, and of law clerks conducting legal research." Nevertheless, the total time written down was only about "7.6% of the hours spent on this case by the Firm's attorneys, planner, paralegals, and law clerks." (Hooper Decl., para. 68).

B. VLF is a Successful Party under CCP section 1021.5 and is Therefore Entitled to Attorneys' Fees:

CCP section 1021.5 provides, in pertinent part, as follows:

"Upon motion, a court may award attorneys' fees to a successful party against one or more opposing parties in any action which has resulted in the enforcement of an important right affecting the public interest if: (a) a significant benefit, whether pecuniary or nonpecuniary, has been conferred on the general public or a large class of persons, (b) the necessity and financial burden of private enforcement...are such as to make the award appropriate, and (c) such fees should not in the interest of justice be paid out of the recovery, if any..."

The Court finds that VLF has met the requirements of section 1021.5 and is therefore entitled to attorneys' fees as a successful party.

In *Keep Our Mountains Quiet v. County of Santa Clara* (2015) 236 CA4th 714, 737-738, the Court noted:

"[T]he 'significant benefit' that will justify an attorney fee award [under section 1021.5] need not represent a 'tangible' asset or a 'concrete' gain but, in some cases, may be recognized simply from the effectuation of a fundamental constitutional or statutory policy. (Citation omitted). Because 'the public always has a significant interest in seeing that legal strictures are properly enforced ..., in a real sense, the public always derives a 'benefit' when illegal private or public conduct is rectified.'" (Citation omitted)...

"A judge must award attorney's fees under CCP § 1021.5 when the party seeking fees has met the statutory criteria unless special circumstances make the award unjust. *Vosburg v County of Fresno*, supra, 54 CA5th at 450; *Carlsbad Police Officers Ass'n v City of Carlsbad* (2020) 49 CA5th 135, 145. Each of the statutory criteria must be satisfied. *City of Oakland v Oakland Police & Fire Retirement Sys.* (2018) 29 CA5th 688, 697–698." (California Judges Benchbook: Civil Proceedings Before Trial, sec. 16.108 (2024)).

“[W]hether a party is ‘successful’ for purposes of § 1021.5 requires an analysis of the circumstances surrounding the litigation and a pragmatic assessment of the gains achieved by a particular action.” (Vosburg v. County of Fresno (2020) 54 CA5th 439, 450-451).

“Courts have taken a ‘broad, pragmatic view’ of what constitutes a successful party. Generally, a party is successful under sec. 1021.5 if it achieves some relief from the benchmark conditions challenged in the lawsuit. (Folsom v. Butte County Ass’n of Gov’ts (1982) 32 C3d. 668, 687 [Citation omitted]. See Maria P. v. Riles (1987) 43 C3d 1281, 1292 (successful party is a party that ‘succeed[s] on any significant issue in litigation which achieves some of the benefit the parties sought in bringing suit’ [Citation omitted]; City of Oakland v. Oakland Police & Fire Retirement System (2018) 29 CA5th 688, 708 (partial success no bar to fee award)...” (CEB, California Attorney Fee Awards, sec. 3.13.2 (2024)).

“In the CEQA context, courts have held that actions requiring a governmental agency to analyze or reassess environmental impacts associated with a proposed project confer a significant benefit. (Citations omitted).”

It appears that a “significant public benefit” was conferred by the litigation in that the decisions of this Court and the Court of Appeal require further CEQA analysis in a revised EIR in the event the County chooses to go forward with the Ordinance. As a result of VLF’s appeal, the Appellate Court has determined that agricultural conservation easements (ACEs) qualify as compensatory mitigation under 14 CCR 15370(e). Such analysis effects a “fundamental...statutory policy” of full CEQA compliance. (Keep Our Mountains Quiet). The residents of Kern County “have benefitted from a more in-depth CEQA review, notwithstanding the ultimate outcome of this matter.” (Center for Biological Diversity v. County of San Bernardino (2010) 185 CA4th 866, 895).

RPIs and County argue that no significant benefit was conferred on the general public because the result of the challenge to the Ordinance and SREIR was the setting aside of an environmentally friendly ordinance that had required new standards, conditions, and mitigation measures on oil and gas activities that were “as of right” both prior to the passage of the Ordinance and now.

However, this argument has been rejected by the Court of Appeal. “The Ordinance’s primary purpose is the acceleration of oil and gas development” and not protection of the environment. (King and Gardiner Farms v. County of Kern (2020) 45 CA5th 814, 898).

In support of its argument that no significant benefit has been conferred on the general public or large class of persons, RPIs cites Concerned Citizens of La Habra v. City of La Habra (2005) 131 CA4th 329 (“Concerned Citizens”) and Christward Ministry v. County of San Diego (1993) 13 CA4th 31 (“Ministry”).

These cases do not appear to be helpful to RPI’s argument because they are factually distinguishable from the facts in this matter. The failings of the SREIR here, as set forth in the initial judgment of this Court as well as in the Appellate opinion, cannot be characterized as a “minute blemish” (as set forth in Concerned Citizens). Nor can it be said that “the relief obtained added little to what had already been required by regulatory agencies” (K and Z, sec. 23.128 (cited in reference to the holding in the Ministry case)).

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RPIs argue that separate enforcement by VLF was unnecessary. There was no need for separate lawsuits and separate teams of attorneys since VLF and Arvin both prayed for the same primary remedy: setting aside the 2021 Ordinance and SREIR. Also, VLF and Arvin discussed litigation strategy, reviewed drafts of each other's petitions, and raised many overlapping issues.

The Court finds that VLF was entitled to file its own lawsuit and focus on its own issues. "Litigants have a right to be represented by counsel of their choice, particularly in substantive areas requiring particular expertise." (*Banning Ranch Conservancy v. Superior Court* (2011) 193 CA4th 903, 908).

"If two private parties prosecute important public interest litigation together and obtain the same success, neither party's services can be deemed unnecessary simply because the other party would have succeeded without them." (*State Water Resources Board Cases* (2008) 161 CA4th 304, 315).

C. There is Precedence for a Large Attorneys' Fee Award:

RPIs submitted the Declaration of Attorney Moorman who conducted research on the issue of the amount of attorneys' fees awarded in reported cases. His research indicated that he found no reported cases where the award was anywhere close to the amounts claimed by VLF.

However, it appears that the research excluded both fee settlements and trial court fee awards that were not appealed. In his Reply Declaration (para. 15), Attorney Pearl states that he is aware of at least seven cases in which he was personally involved that resulted in fee awards exceeding \$1 million. One of those cases resulted in a fee settlement of \$5 million.

In the Reply Declaration of Attorney Hooper (para. 3), she cites five cases where her firm obtained fee awards in excess of \$1 million. SMW "obtained a fee settlement of \$1.975 million" in one case, "obtained a fee settlement of \$1.7 million" in another, "won an interim fee award of \$1.9 million" in a third, "am informed, and on that basis believe" that there was a \$3.9 million attorneys' fee settlement in a fourth case, and "obtained a fee settlement of \$989,786" in a fifth case. The current value of the fee settlement in the fifth case in today's dollars she estimates to be approximately \$1.26 million.

D. Time Records Submitted by VLF Attorneys are Properly Documented:

RPIs argue that VLF did not produce actual bills nor "contemporaneous time logs" that SMW lawyers prepared each day. As a result, the hours submitted are not credible. Attorney Hooper states that she wrote off time "to accurately reflect only the time for which VLF is clearly entitled to compensation." There is no way to scrutinize this assertion without contemporaneous time logs. The total time written off was just 7.6% of all hours. (Hooper Decl., para. 68). (RPI Opposition brief, p. 17, line 16-p. 18, line 10).

VLF asserts that the records reflect hours contemporaneously entered at the time attorneys performed the work. According to Hooper's Declaration, para. 65: "During the course of the day, I and others in the Firm keep a record of the time expended in tenths of hours. For each day and each client, a written entry is recorded that notes the time spent and the general nature of the work performed. This time log serves as the basis for the billings sent to the Firm's clients and for summaries submitted to the court in cases involving statutory fee awards." Daily summaries of time spent are attached as Exhibit A to Hooper's Declaration. "The summaries are prepared on the basis of the contemporaneous time logs

maintained by attorneys, [] paralegals [] and the Firm's law clerks." (Hooper Decl. para. 66).

"The California courts do not require detailed time records. Trial courts have discretion to award fees based on declarations of counsel describing the work they have done and the court's own view of the number of hours reasonably spent. See *PLCM Group, Inc. v. Drexler* (2000) 22 C4th 1084, 1095 n4 (claim based on detailed reconstructed records upheld...*Stratton v. Beck* (2017) 9 CA5th 483, 496 (under *PLCM*, contemporaneous records preferred but not required))." (California Attorney Fee Awards, sec. 9.83).

The Court therefore finds that the records submitted are generally sufficient. However, as noted below, some of the time spent was excessive.

E. Determining Market Rate for Attorneys' Fees:

"The determination of 'market rate' is generally based on the rates prevalent in the community where the court is located. (*Altavion, Inc. v. Konica Minolta Sys. Lab, Inc.* (2014) 226 CA4th 26, 71)." (CEB, sec. 9.114).

Higher rates are allowed if the "local [] bar has not the resources to engage in complex litigation on a contingency-fee basis, the public interest [] requires that the financial incentives be adjusted to attract attorneys who are sufficient to the cause. In the absence of any realistic indication plaintiffs could have found local counsel, it was an abuse of discretion to fail even to consider an hourly rate base on counsel's 'home' market rate." (*Horsford v. Board of Trustees* (2005) 132 CA4th 359, 399). (CEB, sec. 9.115).

Plaintiff's declaration that he was familiar with the local market and that no local attorney who regularly practiced on behalf of environmental groups was available to work on a contingent basis and possessed sufficient expertise to represent the plaintiffs was considered sufficient evidence that hiring local counsel was impractical. (*Center for Biological Diversity ("CBD") v. County of San Bernardino* (2010) 188 CA4th 603, 618-619). (CEB, sec. 9.115). "As the only evidence on the issue of availability of local counsel showed plaintiffs' need to retain out-of-area counsel, the court abused its discretion by applying local market rates rather than counsel's home market rates." (CBD at p. 619).

F. Use of San Francisco Rates is Appropriate:

The determination of the "market rate" is generally based on the rates prevalent in the community where the court is located. However, in *PLCM Group, Inc. v. Drexler* (2000) 22 C4th 1084, 1096, the Court affirmed a fee award based on the rates where counsel's office was (San Francisco) instead of where the case was litigated (Los Angeles). Prevailing attorneys from a market where rates are higher than the forum may be entitled to their home market rate in certain circumstances.

In *Horsford v. Board of Trustees* (2005) 132 CA4th 359, 399, the Court of Appeal reversed the trial court's refusal to award San Francisco Bay Area rates to an attorney litigating a difficult FEHA case in Fresno:

"If a potential defendant is too intimidating to the local bar or so replete with resources as to potentially overwhelm local counsel, or if the local plaintiffs' bar has not the resources to engage in complex

litigation on a contingency-fee basis, the public interest in the prosecution of meritorious civil rights cases requires that the financial incentives be adjusted to attract attorneys who are sufficient to the cause. In the absence of any realistic indication plaintiffs could have found local counsel, it was an abuse of discretion to fail even to consider an hourly rate based on counsel's 'home' market rate." (Emphasis added).

In *Center for Biological Diversity v. County of San Bernardino* (2010) 188 CA4th 603, 618, the Court held that plaintiff's Declaration was stating he was familiar with the local market and there was no local attorney available to work on a contingent basis and with the sufficient expertise was sufficient for hiring out-of-town counsel. "A plaintiff's threshold showing of impracticability, however, is not onerous (Horsford, supra, 132 Cal.App.4th at p. 399, 33 Cal.Rptr.3d 644), and the Jorris declaration is sufficient and competent evidence that plaintiffs acted in good faith and hiring qualified counsel in the San Bernardino area was impracticable." (See California Attorney Fee Awards, sec. 9.115).

Here, the Declaration of Mr. Gardiner (para. 5) is sufficient to establish unavailability of local counsel. He stated that in 2015 he retained SMW after diligently looking for attorneys in the Kern County, Fresno, and Sacramento areas. He later retained SMW to represent him in his challenges to the 2021 Ordinance. He states that he had no reason to believe that the Kern, Fresno, and Sacramento law firms he contacted earlier would no longer have the conflicts of interest they had when he contacted them in 2015.

"More importantly, I knew that SMW was familiar with the record and the judicial decisions in the case and was in the best position to determine whether the County's revised environmental review complied with state environmental law and the Court of Appeal decision. I also believed that SMW had done an excellent job in the 2015 litigation against the oil associations' big-firm lawyers and Holland & Knight, the large firm that is the County's outside counsel in San Francisco, and had succeeded in achieving VLF's goals. Therefore, I wanted the Firm to continue to represent me in this matter." (Id., para.5).

The Court therefore finds that use of a San Francisco firm was appropriate. "Home market" rates for VLF are appropriate in this case because hiring local counsel was impractical. (See *Center for Biological Diversity* above).

G. Scope of Trial Court's Discretion on Whether to Apply a Lodestar Adjustment:

"Under *Serrano III*, the lodestar is the basic fee for comparable legal services in the community; it may be adjusted by the court based on factors including, as relevant herein, (1) the novelty and difficulty of the questions involved, (2) the skill displayed in presenting them, (3) the extent to which the nature of the litigation precluded other employment by the attorneys, (4) the contingent nature of the fee award.

"The purpose of such adjustment is to fix a fee at the fair market value for the particular action. In effect, the court determines, retrospectively, whether the litigation involved a contingent risk or required extraordinary legal skill justifying augmentation of the unadorned lodestar in order to approximate the fair market rate for such services. The " 'experienced trial judge is the best judge of the

value of professional services rendered in his court, and while his judgment is of course subject to review, it will not be disturbed unless the appellate court is convinced that it is clearly wrong.’ ” (Ketchum v. Moses (2001) 24 C.4th 1122, 1131-1132).

“Trial courts have considerable discretion in determining whether to apply a lodestar adjustment and the size of that adjustment. ‘[T]he awarding of attorney fees and the calculation of attorney fee enhancements are highly fact-specific matters best left to the discretion of the trial court.’ (Graham v. DaimlerChrysler Corp. (2004) 34 C.4th 553, 581.” (CEB, California Attorney Fee Awards, sec. 10.4).

“There is no hard-and-fast rule limiting the factors that may justify an exercise of judicial discretion to increase or decrease a lodestar calculation. There are numerous such factors, and their evaluation is entrusted to a trial court’s sound discretion; any one of those factors may be responsible for enhancing or reducing the lodestar.” (Center for Biological Diversity v. County of San Bernardino (Nursery Prods., LLC) (2010) 185 CA4th 866, 901).

H. No Fractional Multiplier is Justified:

RPIs argues that there was no need for two lawsuits and two large teams of attorneys because VLF and Arvin coordinated their efforts during the administrative process for the 2021 Ordinance, discussed strategy, reviewed drafts of each other’s petitions, raised many overlapping issues, and prayed for the same primary remedy. RPIs also argue that to the extent VLF is entitled to any award, the amount should be reduced to account for the private interests of VLF and the Gardiners. Based on these arguments, RPI requests that a fractional multiplier be applied.

VLF argues, and the Court agrees, that it has the right to be represented by counsel of its own choosing, file its own lawsuit, and focus on its own claims. (Banning Ranch Conservancy v. Superior Court (2011) 193 CA4th 103, 108). In La Mirada Avenue Neighborhood Assn. of Hollywood v. City of Los Angeles (2018) 22 CA5th 1149, 1155, the Court upheld separate fee awards in separate petitions that challenged the same project.

Also, the lawsuits here were not duplicative. While some issues overlapped, VLF and Arvin raised a number of separate claims. The fact that both parties sought the same remedy is not surprising, given that the setting aside of the project and the EIR is the usual sought after remedy in a CEQA action.

As to the private interests of the Gardiners and VLF, Mr. Gardiner has stated that “the outcome of this litigation of this litigation could not, and did not, result in any direct pecuniary benefit to me, VLF, or any of my other business interests” and that “the cost of the litigation was far greater than any conceivable indirect benefit to my business interests.” (Gardiner Decl., para. 15).

The Court therefore rejects the argument that a fractional multiplier should apply. VLF was entitled to pursue its own lawsuit irrespective of Arvin’s action.

I. A Multiplier of 1.1 is Appropriate:

A lodestar adjustment is the standard method applied to the determination of reasonable attorney fees. It is not intended as a bonus, reward, or (in the case of a downward adjustment) a penalty. Rather, it is

the second step in calculating a reasonable attorney fee which recognizes that a fee can take into account factors other than just hours and rates. (Pearl Book, sec. 10.1).

The case of *Ketchum v. Moses* (2001) 24 Cal.4th 1122, sets forth the factors to be considered for an award of a multiplier:

Under *Serrano III*, the lodestar is the basic fee for comparable legal services in the community; it may be adjusted by the court based on factors including, as relevant herein, (1) the novelty and difficulty of the questions involved, (2) the skill displayed in presenting them, (3) the extent to which the nature of the litigation precluded other employment by the attorneys, (4) the contingent nature of the fee award. (*Serrano III*, supra, 20 Cal.3d at p. 49.) The purpose of such adjustment is to fix a fee at the fair market value for the particular action. In effect, the court determines, retrospectively, whether the litigation involved a contingent risk or required extraordinary legal skill justifying augmentation of the unadorned lodestar in order to approximate the fair market rate for such services. The “ ‘experienced trial judge is the best judge of the value of professional services rendered in his court, and while his judgment is of course subject to review, it will not be disturbed unless the appellate court is convinced that it is clearly wrong.’ ” (*Ibid.*)” (*Ketchum* at p. 1132).

“Under our precedents, the unadorned lodestar reflects the general local hourly rate for a fee-bearing case; it does not include any compensation for contingent risk, extraordinary skill, or any other factors a trial court may consider under *Serrano III*. The adjustment to the lodestar figure, e.g., to provide a fee enhancement reflecting the risk that the attorney will not receive payment if the suit does not succeed, constitutes earned compensation; unlike a windfall, it is neither unexpected nor fortuitous. Rather, it is intended to approximate market-level compensation for such services, which typically includes a premium for the risk of nonpayment or delay in payment of attorney fees. In this case, for example, the lodestar was expressly based on the general local rate for legal services in a noncontingent matter, where a payment is certain regardless of outcome.

“Of course, the trial court is not required to include a fee enhancement to the basic lodestar figure for contingent risk, exceptional skill, or other factors, although it retains discretion to do so in the appropriate case; moreover, the party seeking a fee enhancement bears the burden of proof. In each case, the trial court should consider whether, and to what extent, the attorney and client have been able to mitigate the risk of nonpayment, e.g., because the client has agreed to pay some portion of the lodestar amount regardless of outcome. It should also consider the degree to which the relevant market compensates for contingency risk, extraordinary skill, or other factors under *Serrano III*. We emphasize that when determining the appropriate enhancement, a trial court should not consider these factors to the extent they are already encompassed within the lodestar. The factor of extraordinary skill, in particular, appears susceptible to improper double counting; for the most part, the difficulty of a legal question and the quality of representation are already encompassed in the lodestar. A more difficult legal question typically requires more attorney hours, and a more skillful and experienced attorney will command a higher hourly rate. (See *Margolin v. Regional Planning Com.* (1982) 134 Cal.App.3d 999, 1004 [185 Cal.Rptr. 145].) Indeed, the “ ‘reasonable hourly rate [used to calculate the lodestar] is the product of a multiplicity of factors ... the level of skill necessary, time limitations, the amount to be

obtained in the litigation, the attorney's reputation, and the undesirability of the case.' " (Ibid.) Thus, a trial court should award a multiplier for exceptional representation only when the quality of representation far exceeds the quality of representation that would have been provided by an attorney of comparable skill and experience billing at the hourly rate used in the lodestar calculation. Otherwise, the fee award will result in unfair double counting and be unreasonable. Nor should a fee enhancement be imposed for the purpose of punishing the losing party." (Emphasis added). (Ketchum, at pp. 1138-1139).

The Court finds that VLF's attorneys demonstrated skill in representing VLF. This was reflected by the fact that the Court of Appeal issued a lengthy, published opinion that upheld their argument on the issue of ACEs.

However, the Court does not find that most of the other issues briefed (both in this Court and the Court of Appeal) were legally or factually extremely difficult. For example, in presenting its arguments to the Court of Appeal, VLF's remedies arguments (requesting the Court to set aside the Ordinance, SREIR and Addendum, and prepare a revised EIR) were the arguments that would be expected in a case like this one. Many of the issues raised were, for the most part, issues that are often argued in CEQA cases.

Even the issue of ACEs was not overly complex. The Appellate Court in *V Lions Farming* clarified its 2020 opinion in *King and Gardiner Farms* on that issue, noting that there was "ambiguity in the 2020 opinion." (*V Lions Farming v. County of Kern* (2024) 100 CA5th 412, 426).

The Court found that the County "mistakenly concluded the [2020] opinion established the principle that ACE's 'do not provide an effective means of even partial mitigation for agricultural conversion impacts.'" (Id., at p. 427). The Court concluded that "the County failed to comply with CEQA when it eliminated the use of ACE's as a mitigation measure for the conversion of agricultural land in situations where the permit applicant's adoption of other mitigation has not reduced the net loss of agricultural land to zero acres." (Id., at p. 437).

After considering these factors, the Court believes a multiplier of 1.1 is appropriate.

J. Attorneys' Fees Requested:

VLF requests that this Court award attorneys' fees for each stage of the proceedings as follows: administrative proceedings: \$399,903.50; trial court proceedings: \$1,327,527.50; appellate court proceedings: \$690,029.50; trial court proceedings on remand: \$58,855.00: total lodestar: \$2,476,315.50. This total reflects 3,110.5 hours of work. VLF requests a lodestar multiplier of 1.5 times the \$2,476,315.50 figure resulting in an adjusted fee request of \$3,714,473.25. In addition, VLF requests fees for this Motion in the amount of \$190,601.00. This total reflects 231.7 hours of work. VLF is not seeking a multiplier for the fees for this Motion.

The total attorneys' fee request is \$3,905,074.25. In addition, VLF requests \$3,923.45 in costs as documented in its Memorandum of Costs.

K. Some of the Time Spent by VLF's Attorneys is Excessive. Those Amounts are therefore

Subtracted from the Lodestar:

VLF is entitled to the hourly rates claimed. At those rates, however, much is reasonably expected regarding how much time should be devoted to a given task. The Court has reviewed the timesheets attached to the Declaration of Ms. Hooper. A number of the hours that SMW spent doing various tasks was excessive.

Initially, the Court notes that SMW was already intimately familiar with this matter when it filed its Petition for Writ of Mandate in this case on March 10, 2021. This is demonstrated by reviewing the history of VLF's (and Arvin's) challenges to the 2015 and 2021 Ordinances.

VLF (then known as King and Gardiner Farms) previously filed a very similar Petition in 2015 when it challenged the original 2015 version of the Ordinance that regulated oil and gas activities. It extensively litigated the matter in this Court and on appeal. After the County adopted a modified Ordinance (the 2021 version) that covered the same activities, VLF and Arvin filed their current Petitions in March of 2021.

VLF and Arvin challenged the 2015 Ordinance on a number of grounds. This Court "found the EIR inadequately analyzed the project's environmental impacts to rangeland and from a road paving mitigation measure, and rejected the other CEQA claims."

On appeal the Court of Appeal found "CEQA violations involving water, agricultural land, and noise...[T]he EIR's disclosures about the mitigation measures were inadequate and, as a result, the adoption of a statement of overriding considerations did not render harmless these failures to comply with CEQA.

"Also, the finding that the project's conversion of agricultural land would be mitigated to a less than significant level is not supported by substantial evidence."

Lastly, the Court of Appeal found "CEQA violations existed with respect to air quality and related health risks." (King and Gardiner Farms, LLC v. County of Kern (2020) 45 CA5th 814, 829-830).

After the County adopted a slightly modified 2021 Ordinance, VLF and Arvin challenged that Ordinance on multiple grounds. This Court found "[the SREIR] was deficient in analyzing environmental impacts of [the] ordinance on rangeland and of road paving mitigation measure[s], but denied all other CEQA claims."

The Court of Appeal found that "ACE's [agricultural conservation easements] qualify as compensatory mitigation, even though they do not replace or otherwise offset the acres of agricultural land converted by the project—that is, they do not ensure the project results in no net loss of agricultural land." The Court found CEQA violations where the County removed a water supply mitigation measure and failed to properly assess "cancer risks associated with the drilling of multiple wells near sensitive receptors." The Court also found that VLF and Arvin failed to carry their burden of proof on all other alleged CEQA violations. (V Lions Farming, LLC v. County of Kern (2024) 100 CA5th 412, 419-420, 438).

The Court has reviewed the timesheets submitted by VLF's attorneys.

(a) Time Spent on the Administrative Proceedings is Excessive:

ADMINISTRATIVE PROCEEDINGS:

Rachel Hooper, JD \$925 per hour, 148 hours= \$ 136,900.00

Kevin Bundy, JD \$875 per hour, 52.9 hours= \$ 46,287.50

Susannah French, JD \$850 per hour, 90.5 hours= \$ 76,925.00

Tori Gibbons, JD \$690 per hour, 186.9 hours= \$ 128,961.00

Carmen Borg, Planner \$250 per hour, 25.4 hours= \$ 6,350.00

Law Clerks \$200 per hour, 22.4 hours=\$ 4,480.00

TOTAL 526.1 hours=\$ 399,903.50

The Court finds that this amount is excessive. Examples include the following:

During the administrative process, SMW staff spent approximately 28.1 hours researching ACEs, approximately 16.2 hours researching "overriding findings," and approximately 51.2 hours researching "legacy equipment" for a total of 95.5 hours of research. Approximately 91 entries involved "reviewing" work that was done by others. While reviewing documents is essential and useful in many instances, the Court believes that the large number of "reviewing" entries can also indicate duplicative work and over-staffing. SMW lists some 56 entries involving approximately 54.2 hours concerning the issue of potential settlement. This too is excessive.

The Court therefore finds the time spent during the administrative proceedings was excessive, and the billing for a reasonable amount of time must be reduced from \$399,903.50 to the reasonable sum of \$250,000.

(b) Time Spent on the Trial Court Proceedings is Excessive:

TRIAL COURT PROCEEDINGS:

Rachel Hooper, JD 1980 \$925 per hour, 479.1 hours= \$ 443,167.50

Kevin Bundy, JD 2003 \$875 per hour, 277.4 hours= \$ 242,725.00

Susannah French, JD 1993 \$850 per hour, 609.5 hours= \$ 518,075.00

Tori Gibbons, JD 2012 \$690 per hour, 125 hours=\$ 86,250.00

Maurene Ryan, Sr. Paralegal \$250 per hour, 83.4 hours= \$ 20,850.00

Julie Dolinsek, Jr. Paralegal \$200 per hour, 17.5 hours= \$ 3,500.00

Law Clerks 200 per hour, 64.8 hours=\$ 12,960.00

TOTAL 1,656.7 hours=\$ 1,327,527.50

The Court finds this amount excessive. Examples include the following:

SMW spent approximately 155.7 hours on drafting the opening brief in this Court. Of that total, at least 29.6 hours was spent on "cite checking" the opening brief. The Court notes an inordinate amount of time was spent on cite checking throughout the court proceedings. SMW spent approximately 353.3 hours on drafting the reply brief. SMW spent approximately 111 hours on preparation for the hearing. Approximately 388.5 hours were spent on preparing the proposed judgment and briefing the remedies issue. Overall, the Court notes a general pattern of excessive time spent on issues briefed before this Court.

The Court therefore finds the time spent during the trial court proceedings was excessive, and the billing for a reasonable amount of time must be reduced from \$1,327,527.50 to the reasonable sum of \$850,000.

(c) Time Spent on the Appeal is Excessive:

APPELLATE COURT PROCEEDINGS:

Rachel Hooper, JD 1980 \$925 per hour, 196.7 hours= \$ 181,947.50

Kevin Bundy, JD 2003 \$875 per hour, 152.6 hours= \$ 133,525.00

Susannah French, JD \$850 per hour, 382.4 hours= \$ 325,040.00

Tori Gibbons, JD 2012 \$690 per hour, 45.3 hours= \$ 31,257.00

Maurene Ryan \$250 per hour, 24 hours= \$ 6,000.00

Law Clerks \$200 per hour 61.3 hours= \$ 12,260.00

TOTAL 862.3 hours= \$ 690,029.50

When comparing the complexity of the issues VLF raised in response to the 2015 Ordinance particularly on appeal compared to the issues raised in response to the 2021 Ordinance, it would appear that the challenges to the 2015 Ordinance were more numerous and complex than the issues raised concerning the 2021 Ordinance. Yet, SMW requests attorneys' fees for 862.3 hours for the appellate proceedings here, while requesting 822.1 hours for the first appeal. While the Court understands that in the current case there was some extra briefing done as a result, for example, of requesting a writ of supersedeas and responding to amicus briefs that were filed, nevertheless, the Court believes the hours requested for work on the appeal are excessive.

The Court finds that the issues addressed by VLF on appeal were relatively few in number (the main issue being the use of ACEs for mitigation) and not overly complex. The remedies requested by VLF and granted by the Court were the types of remedies that are normally requested in a CEQA action (e.g.,

setting aside the Ordinance and the SREIR, remanding the matter to the trial court, etc.).

The Court also notes that there are numerous entries documenting significant time spent concerning “editing,” “reviewing” and “revising” the briefs filed by VLF in the Appellate Court. This would indicate excessive billing.

The Court therefore finds that the total time spent on the appeal was excessive and reduces the amount of \$690,029.50 to the reasonable amount of \$500,000.

(d) Time Spent on Court Proceedings on Remand is Excessive:

COURT PROCEEDINGS ON REMAND:

Rachel B. Hooper \$925 per hour, 32.6 hours=\$ 30,155.00

Kevin P. Bundy \$875 per hour, 32.8 hours= \$ 28,700.00

Total hours: 65.4=\$58,855.00

Most of the time spent was on preparation of a proposed judgment and writ that was ultimately submitted to this Court. The Court finds the time spent on this task was excessive and reduces the amount of \$58,855.00 to the reasonable amount of \$40,000.00.

(e) Time Spent on Fees for this Motion is Reasonable:

FEES FOR THIS MOTION:

Total hours: 231.7=\$190,601.00

The Court finds this amount to be reasonable.

(f) COSTS in the amount of \$3,923.45 are awarded:

Exhibit F to Hooper’s Declaration lists Westlaw charges for legal research for selected dates between February 28, 2021 and May 31, 2023 totaling \$2,972.98. It also includes the cost of a transcript of the September 10, 2020 hearing on a motion to enforce writ of \$145.60, with FedEx shipping of \$22.33. It lists meals on six separate occasions between September 19, 2021 and January 12, 2024 totaling \$550.66, and lodging corresponding to those meal dates of \$1,669.28. The grand total is \$5,360.85 for “recoverable expenses.”

“When relief is awarded to the petitioner, [] a cost award is discretionary, under the general rule that when the recovery in a civil case is other than monetary relief, the trial court determines the prevailing party and may in its discretion award costs to that party. (CCP sec. 1032(a)(4); *Preserve Wild Santee v. City of Santee* (2012) 210 CA4th 260, 291...This includes discretion to apportion costs among the parties, or deny a cost award altogether, when the petitioner prevails on only some of the issues. (*Madera Oversight Coalition, Inc. v. County of Madera* (2011) 199 CA4th 48, 106; *East Bay Municipal Utility Dist. v. Dept. of Forestry and Fire Protection* (1996) 43 CA4th 1113, 1133).” (K and Z, sec. 23.139A).

“[W]e conclude that the trial court correctly determined it had the discretionary authority under Code of

Civil Procedure section 1032, subdivision (a)(4) to apportion costs. In other words, when a plaintiff obtains a writ of mandate in a CEQA proceeding, that nonmonetary relief alone does not entitle the plaintiff to costs as a matter of right under Code of Civil Procedure section 1032, subdivision (b).” (Madera Oversight at p. 106).

Here, VLF requests \$3,923.45 in costs as documented in its Memorandum of Costs. There is no objection to this amount. The Court will award this amount. In its Reply brief, VLF requests a total of \$5,360.85 in “Recoverable expenses.” It is not clear if this amount is a revision of the \$3,923.45 amount. In any event, no documentation has been provided to support this higher figure.

L. Ruling on Amount of Fees and Costs Granted by the Court to VLF:

Based on the calculations referenced above, the Court awards a lodestar of \$1,830,601.00. The Court awards a 1.1 multiplier for a sub-total of \$2,013,661.10, fees for this Motion of \$190,601.00 and recoverable expenses of \$3,923.45 and for a grand total of \$2,208,185.55.

III. Arvin Petitioners’ (“Arvin”) Motion for Attorneys’ Fees

A. Issues and Conclusions Addressed by this Court in its Ruling on VLF’s Motion (above) that are the Same Here:

The factual and legal findings of this Court in its Ruling on VLF’s Motion apply to Arvin’s Motion as well. Therefore, the Court will not repeat the analyses here, except as discussed below.

Arvin is a successful party under section 1021.5 and is entitled to attorneys’ fees.

It appears that a “significant public benefit” was conferred by the litigation in that the decisions of this Court and the Court of Appeal require further CEQA analysis in a revised EIR in the event the County chooses to go forward with the Ordinance. This Court found that the County failed to adopt adequate, enforceable mitigation for increased PM2.5 emissions and that the County did not properly analyze or mitigate water supply impacts, particularly in disadvantaged communities.

As a result of Arvin’s appeal, the Appellate Court, in the unpublished portion of its opinion, determined that the SREIR’s analysis of the cancer risk associated with the drilling of more than one well near a sensitive receptor was inadequate for purposes of CEQA. The Appellate Court also found that the County misconstrued CEQA when it decided to remove a water supply mitigation measure because there was no requirement in CEQA to analyze impacts to low income communities. Contrary to the County’s analysis, the Court found that social and economic effects are relevant in determining the significance of a physical change to the conditions constituting the environment.

These Court rulings effect a “fundamental...statutory policy” of full CEQA compliance. (Keep Our Mountains Quiet). The residents of Kern County “have benefitted from a more in-depth CEQA review, notwithstanding the ultimate outcome of this matter.” (Center for Biological Diversity v. County of San Bernardino (2010) 185 CA4th 866, 895).

B. A Multiplier of 1.1 is Appropriate:

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The Court finds that Arvin's attorneys demonstrated skill in representing Arvin. This was reflected by the fact that the Court of Appeal issued a lengthy, though unpublished, opinion that upheld Arvin's arguments concerning analysis of the multi-well health risk assessment and water supply impacts to disadvantaged communities.

However, the Court does not find that most of the other issues briefed (both in this Court and the Court of Appeal) were legally or factually extremely difficult. For example, Arvin's remedies arguments (requesting the Court to set aside the Ordinance, SREIR and Addendum, and prepare a revised EIR) were the arguments that would be expected in a case like this one. Many of the issues raised were, for the most part, issues that are often argued in CEQA cases.

Further, issues that Arvin previously raised in the initial litigation in this matter (discussed in *King and Gardiner Farms, LLC v. County of Kern* (2020) 45 CA5th 814) were raised again in the current litigation: the multi-well Health Risk Assessment and impacts to the water supply.

Though these arguments were not identical to the arguments raised in the earlier litigation, nevertheless, Arvin's attorneys were already very familiar with the Ordinance and its environmental impacts. The overall number of hours billed in the current litigation should reflect that familiarity, but they do not. In the initial action, Arvin's lodestar was \$1,753,630. Yet, in the current matter, Arvin has billed for 4,267.9 hour reflected in a lodestar of \$2,968,428. (This excludes time spent on the Fee Motion).

After considering these factors, the Court believes a multiplier of 1.1 is appropriate.

C. Time Records Submitted by Arvin's Attorneys are Properly Documented:

RPIs claim that Arvin must demonstrate how much time was spent on particular claims (since they were unsuccessful on several) and whether the hours were reasonably expended. Arvin has failed to produce billing records showing work performed on distinct claims.

Arvin distinguishes the cases cited by RPIs to support this proposition and claims there is no required level of detail that attorneys must show in their time entries. Further, Arvin claims their attorneys produced many issue-specific entries. Also, Arvin is not required to show that every time entry relates to a winning claim.

Concerning time records, "there is no required level of detail that counsel must achieve." (California Attorney Fee Awards, sec. 9.84). A party that obtains "excellent results" is entitled to a "fully compensatory fee." "Excellent results do not necessarily require a party to win every issue or gain every bit of relief sought." (Id., at sec. 9.50). Time spent on "unrelated" (nonfee-shifting claims) is generally not compensable, but if there are unsuccessful related claims, a court may award a fully compensatory fee. (Id., at sec. 9.51).

"The California courts do not require detailed time records. Trial courts have discretion to award fees based on declarations of counsel describing the work they have done and the court's own view of the number of hours reasonably spent. See *PLCM Group, Inc. v. Drexler* (2000) 22 C4th 1084, 1095 n4 (claim based on detailed reconstructed records upheld...*Stratton v. Beck* (2017) 9 CA5th 483, 496 (under *PLCM*,

contemporaneous records preferred but not required).” (Id., sec. 9.83).

The Court therefore finds that the records submitted are generally sufficient. However, as noted below, some of the time spent was excessive.

D. Amount of Fees Requested:

Arvin requests that this Court award attorneys’ fees for each stage of the proceedings as follows: administrative proceedings: \$506,384.00; trial court proceedings: \$1,695,455.00; appellate court proceedings: \$729,760.00; trial court proceedings on remand: \$36,829.00: total lodestar: \$2,968,428.00. This total reflects 4,267.9 hours of work. Of the \$2,968,428 requested, attorneys for Earthjustice claimed the most: \$2,436,577.50. (O’Brien Decl., para. 93, and Exhibits A-F thereto). Arvin requests a lodestar multiplier of 1.5 times the \$2,968,428.00 figure resulting in an adjusted fee request of \$4,452,642.00. In addition, Arvin requests fees for this Motion in the amount of \$181,290.00. Arvin is not seeking a multiplier for the fees for this Motion.

The total attorneys’ fee request is \$4,633,932.00. Arvin also requests costs in the amount of \$7,780.31. The grand total requested is \$4,641,712.31.

Arvin claims to have written off 40.3 percent of their attorneys’ hours actually spent on this matter. (O’Brien Decl., para. 98).

E. Some of the Time Spent by Arvin’s Attorneys is Excessive. Those Amounts are therefore Subtracted from the Lodestar:

Arvin is entitled to the hourly rates claimed. At those rates, however, much is reasonably expected regarding how much time should be devoted to a given task. The Court has reviewed the timesheets submitted. A number of the hours that Arvin’s attorneys spent doing various tasks was excessive.

Initially, the Court notes that Arvin’s attorneys were already intimately familiar with this matter when they filed the Petition for Writ of Mandate in this case on March 10, 2021. This is demonstrated by reviewing the history of Arvin’s challenges to the 2015 and 2021 Ordinances.

Arvin challenged the 2015 Ordinance on a number of grounds. This Court “found the EIR inadequately analyzed the project's environmental impacts to rangeland and from a road paving mitigation measure, and rejected the other CEQA claims.”

On appeal the Court of Appeal found “CEQA violations involving water, agricultural land, and noise...[T]he EIR's disclosures about the mitigation measures were inadequate and, as a result, the adoption of a statement of overriding considerations did not render harmless these failures to comply with CEQA.

“Also, the finding that the project's conversion of agricultural land would be mitigated to a less than significant level is not supported by substantial evidence.”

Lastly, the Court of Appeal found “CEQA violations existed with respect to air quality and related health

risks.” (King and Gardiner Farms, LLC v. County of Kern (2020) 45 CA5th 814, 829-830).

After the County adopted a slightly modified 2021 Ordinance, Arvin challenged that Ordinance on multiple grounds. This Court found “[the SREIR] was deficient in analyzing environmental impacts of [the] ordinance on rangeland and of road paving mitigation measure[s], but denied all other CEQA claims.”

The Court of Appeal found CEQA violations where the County removed a water supply mitigation measure and failed to properly assess “cancer risks associated with the drilling of multiple wells near sensitive receptors.” The Court also found that Arvin failed to carry their burden of proof on all other alleged CEQA violations. (V Lions Farming, LLC v. County of Kern (2024) 100 CA5th 412, 419-420, 438).

The Court recognizes that Arvin’s attorneys represent numerous parties to this litigation including Natural Resources Defense Council and Sierra Club (represented by Earthjustice), Committee for a Better Arvin, Committee for a Better Shafter, and Comite Profreso de Lamont (represented by Center on Race, Poverty, and the Environment), Natural Resources Defense Council (represented by Paulina Torres), and Center for Biological Diversity (represented by Hollin Kretzmann and Talia Nimmer with Center for Biological Diversity).

All of these parties, however, basically presented a united argument in this litigation and the previous litigation. The Court is therefore of the opinion that Arvin billed for too many attorneys. “The lodestar may be reduced due to the inefficient use of multiple counsel.” (California Attorney Fee Awards, sec. 9.73; Mikhaeilpoor v. BMW of N. America, LLC (2020) 48 CA5th 240, 255; Chavez v. Netflix, Inc. (2008) 162 CA4th 43, 64).

A pattern repeated throughout the billings submitted is the significant amount of time spent by various attorneys reviewing the work of others. While reviewing others’ work is necessary, the amount of time spent in reviewing appears to be the product of having so many different attorneys working on the same, similar, or overlapping issues. As shown below, Arvin billed for eight different attorneys from several law firms for work on the administrative proceedings, nine attorneys for work on trial court proceedings, eight on appellate court proceedings, and five on remand proceedings. Much of this appears to result in the inefficient use of attorney time.

(a) Time Spent on the Administrative Proceedings is Excessive:

ADMINISTRATIVE PROCEEDINGS:

Colin O'Brien, JD 2003 \$ 875 per hour, 278.1 hours= \$243,337.50

Greg Muren, JD 2017 \$ 550 per hour, 232.6 hours= \$ 127,930.00

Michelle Ghafar, JD 2016 \$ 600 per hour, 20.4 hours= \$12,240.00

Hollin Kretzmann, JD 2008 \$725 per hour, 52.9 hours=\$38,352.50

Ann Alexander, JD 1987 \$ 890 per hour, 54.1 hours=\$ 48,149.00

Elizabeth Benson, JD 2009 \$700 per hour, 9.6 hours=\$6,720.00

Chelsea Tu, JD 2013 \$350 per hour, 80.1 hours= \$28,035.00

Dan Ress, JD 2020 \$300 per hour, 5.4 hours= \$1,620.00

Total Billed for Administrative Proceedings: \$506,383.50

A total of eight attorneys billed for time spent during the administrative proceedings. The Court reviewed the timesheets for all eight. The use of all these attorneys appears to have resulted in redundancy in terms of work done on particular topics as well as time billed.

The Court finds that the amount billed is excessive. Examples include the following:

The lead attorney, Mr. O'Brien, billed approximately 172 hours reviewing, editing, and in some cases drafting, comments to the SREIR. Attorney Muren spent approximately 149 hours reviewing, revising, and occasionally drafting comments to the SREIR. These amounts appear to be excessive. Attorney Kretzmann billed approximately 45 hours for the same or similar work. Attorney Alexander billed approximately 24.2 hours for this work. Attorney Benson billed about 7.6 hours in this category. The Court believes that time spent on this category is excessive and often redundant.

The Court therefore finds the time spent during the administrative proceedings was excessive, and the billing for a reasonable amount of time must be reduced from \$506,383.50 to the reasonable sum of \$250,000.

(b) Time Spent on the Trial Court Proceedings is Excessive:

TRIAL COURT PROCEEDINGS:

Colin O'Brien, JD 2003 \$ 875 per hour, 902.9 hours=\$ 790,037.50

Greg Muren JD 2017 \$ 550 per hour, 754.1 hours=\$ 414,755.00

Richard Franco, JD 1993 \$ 850 per hour, 192.0 hours= \$ 163,200.00

Earthjustice Law Clerks / Externs \$200 per hour, 133.8 hours= \$26,760.00

Hollin Kretzmann, JD 2008 \$725 per hour, 118.8 hours= \$86,130.00

Caroline Farrell, \$525 per hour, 11.3 hours=\$5,932.50

Ann Alexander, JD 1987 \$ 890 per hour, 179.0 hours= \$ 159,310.00

Elizabeth Benson, JD 2009 \$700 per hour, 22.5 hours=\$15,750.00

Chelsea Tu, JD 2013 \$350 per hour, 62.6 hours= \$21,910.00

Dan Ress, JD 2020 \$300 per hour, 38.9 hours= \$11,670.00

Total billed for Trial Court Proceedings: \$1,695,455.00

A total of nine attorneys billed for time spent during the trial court proceedings. This appears to be an inefficient use of attorney time.

The Court finds the amount billed is excessive. Examples include the following:

The lead attorney, Mr. O'Brien, billed approximately 25.4 hours for editing and/or reviewing the Petition. This amount is excessive. The Petition contained many allegations that were similar or identical to the first Petition. Mr. O'Brien also billed approximately 85.4 hours for meetings and emails related to "litigation strategy" and "case management."

He billed approximately 4.7 hours for reviewing a stipulation. He billed approximately 11.8 hours for reviewing a draft of a motion to enforce writ and another approximately 20.7 hours to review and edit a second motion to enforce writ. He billed about 16.3 hours for drafting the "background section" of the opening brief. For reviewing arguments made by the opposition on only one issue, he billed approximately 30 hours. These amounts appear to be excessive.

Another example of excessive and redundant billing is reflected in the billing of attorney Alexander. She billed approximately 25 hours for researching and drafting a memo on "overriding considerations," while also spending 1.5 hours summarizing a memo from attorneys at SMW on the same subject. She spent approximately 25.5 hours drafting and revising the "overriding considerations section" while also spending 3.2 hours reviewing SMW's overriding considerations section.

Attorney Benson billed a total of 22.8 hours for time spent under the category of trial court proceedings; yet, 14.4 of those hours were spent in phone calls with other counsel. Attorney Tu billed a total of 62.6 hours under court proceedings, but approximately 18.9 of those hours were phone calls with co-counsel. Attorney Ress billed 38.9 hours to trial court proceedings, but approximately 6 hours of that time was reviewing the work of others, and approximately 4.3 hours were spent with calls or correspondence with co-counsel.

Attorney Farrell billed a total of 11.3 hours under trial court proceedings; yet 3.3 of those hours were spent reviewing the work of others, and 4.4 hours were spent in phone calls with co-counsel.

The Court therefore finds the time spent during the trial court proceedings was excessive, and the billing for a reasonable amount of time must be reduced from \$1,695,455.00 to the reasonable sum of \$900,000.

(c) Time Spent on the Appeal is Excessive:

APPELLATE COURT PROCEEDINGS:

Colin O'Brien, JD 2003 \$ 875 per hour, 411.4 hours=\$ 359,975.00

Greg Muren, JD 2017 \$ 550 per hour, 411.0 hours= \$ 226,050.00

Nirit Lotan, LLM 2011 \$ 475 per hour, 90.3 hours= \$42,892.50

Hollin Kretzmann, JD 2008 \$725 per hour, 37.1 hours=\$26,897.50

Caroline Farrell, \$525 per hour, 8.8 Hours=\$4,620.00

Ann Alexander, JD 1987 \$ 890 per hour, 43.5 hours= \$ 38,715.00

Elizabeth Benson, JD 2009 \$700 per hour, 22.3 hours= \$15,610.00

Dan Ress, JD 2020 \$300 per hour, 50.0 hours= \$15,000.00

Total billed for Appellate Court Proceedings: \$729,760.00

When comparing the complexity of the issues Arvin raised on appeal in response to the 2015 Ordinance compared to the issues Arvin raised in response to the 2021 Ordinance, it would appear that the challenges to the 2015 Ordinance were similar to and at least as complex as the issues raised concerning the 2021 Ordinance. Yet, Arvin requests attorneys' fees in the amount of \$729,760.00 for the appellate proceedings here, while requesting \$414,175.00 for the first appeal. While the Court understands that in the current case there was some extra briefing done as a result of requesting a writ of supersedeas and responding to amicus briefs that were filed, nevertheless, the Court believes the hours requested for work on the appeal are excessive.

The Court finds that the issues addressed by Arvin on appeal were not overly complex. The Appellate Court addressed those issues in the unpublished portion of its opinion. The Court found that the SREIR's discussion of the cancer risk associated with the drilling of more than one well near a sensitive receptor was inadequate for purposes of CEQA. The Court also found that the SREIR should have addressed information about baseline water supply conditions in disadvantaged communities and the nature or magnitude of the impacts to those communities. The Court ruled that Arvin did not meet "its burden of establishing prejudicial error involving (1) the air quality mitigation measures addressing emissions of particulate matter, (2) the analysis of impacts to the Temblor legless lizard, or (3) the absence of Spanish language translations of certain notices and portions of the SREIR." (V Lions Farming at p. 420).

The remedies requested by VLF and granted by the Court were the types of remedies that are normally requested in a CEQA action (e.g., setting aside the Ordinance and the SREIR, remanding the matter to the trial court, etc.).

In addition, the Court finds the amount billed is excessive. Examples include the following:

Attorney O'Brien billed approximately 101.3 hours for work on the writ of supersedeas. Attorney Muren billed approximately 130.9 hours for work on the same writ. Attorney Kretzmann billed 6.1 hours and attorney Alexander billed for 5.2 hours for work on the same writ. The amount of time spent by Mr. O'Brien alone or Mr. Muren alone is excessive, not to mention the cumulative time spent.

The Court therefore finds that the time spent on the appeal was excessive and reduces the amount of \$729,760.00 to the reasonable amount of \$500,000.

(d) Time Spent on Court Proceedings on Remand is Reasonable:

TRIAL COURT REMAND:

Colin O'Brien, JD 2003 \$ 875 per hour, 33.6 hours= \$29,400.00

Hollin Kretzmann, JD 2008 \$725 per hour, 4.4 hours= \$3,190.00

Ann Alexander, JD 1987 \$ 890 per hour, 2.1 hours=\$ 1,869.00

Elizabeth Benson, JD 2009 \$700 per hour, 2.7 hours=\$1,890.00

Dan Ress, JD 2020 \$300 per hour, 1.6 hours= \$480.00

Total billed for Trial Court Remand: \$36,829.00

The Court will award this amount.

(e) Time Spent on Fees for this Motion is Reasonable:

FEES FOR THIS MOTION:

Total hours: 259.3=\$181,290.00

The Court finds this amount to be reasonable.

(f) COSTS in the amount of \$7,780.31 are awarded:

Arvin requests \$7,780.31 in costs as documented in its Memorandum of Costs. There is no objection to this amount. The Court will therefore award this amount.

F. Ruling on Amount of Fees and Costs Granted by the Court to Arvin:

Based on the calculations referenced above, the Court awards a lodestar of \$1,868,119.00. The Court awards a 1.1 multiplier for a sub-total of \$2,054,930.90, fees for this Motion of \$181,290.00 and recoverable expenses of \$7,780.31 for a grand total of \$2,244,001.21.

DISPOSITION:

Each Petitioner shall prepare an order consistent with this ruling for the Court's signature pursuant to the California Rules of Court.

Copy of minute order provided to all parties as stated in the attached Certificate of Service.

VAQUERO ENERGY VS COUNTY OF KERN
BCV-15-101645

CERTIFICATE OF SERVICE

The undersigned, of said Kern County, certify: That I am a Deputy Clerk of the Superior Court of the State of California, in and for the County of Kern, that I am a citizen of the United States, over 18 years of age, I reside in or am employed in the County of Kern, that I am not a party to the within action and that my business address is 1215 Truxtun Avenue Bakersfield, CA 93301, that I served the **Minutes dated March 06, 2025** attached hereto on all interested parties and any respective counsel of record in the within action, following standard Court practices, by: (a) enclosing true copies thereof in a sealed envelope(s) with postage fully prepaid and depositing/placing for collection and delivery in the United States mail at Bakersfield, California; and/or (b) enclosing true copies thereof in a Kern County interoffice envelope(s) and placing for collection and delivery; and/or (c) by posting true copies thereof, to the Superior Court of California, County of Kern, Non-Criminal Case Information Portal (www.kern.courts.ca.gov); and/or (d) electronically transmitting true copies thereof by electronic service or e-mail. Service address(es) are indicated on the attached service list.

Date of Service: March 06, 2025

Place of Service: Bakersfield, CA

Sent from electronic service address: donotreply@kern.courts.ca.gov

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Tara Leal
CLERK OF THE SUPERIOR COURT

Date: March 06, 2025

By: *Robin McDonald*
Robin McDonald, Deputy Clerk

VAQUERO ENERGY VS COUNTY OF KERN
BCV-15-101645

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FILED
 KERN COUNTY SUPERIOR COURT
 04/03/2025
 BY Evans, Gricelda
 DEPUTY

9
 10 Attorneys for V Lions Farming, LLC

11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

12 **COUNTY OF KERN**

13 VAQUERO ENERGY INC., a California
 corporation; and HUNTER EDISON OIL
 14 DEVELOPMENT LIMITED PARTNERSHIP, a
 California limited partnership,

15 Petitioners and Plaintiffs,

16 v.

17 COUNTY OF KERN, KERN COUNTY BOARD
 18 OF SUPERVISORS, and DOES 1-10,

19 Respondents.

Case No. BCV-15-101645-GP (Lead Case)
 Consolidated with
 Case No. BCV-21-100533-GP and
 Case No. BCV-21-100536-GP

**[PROPOSED] ORDER GRANTING IN
 PART PETITIONER V LIONS FARMING
 LLC'S MOTION FOR ATTORNEYS' FEES
 AND EXPENSES**

Date: February 19, 2025

Time: 8:30 a.m.

Div.: J

Judge: Hon. Gregory Pulskamp

20 CALIFORNIA INDEPENDENT PETROLEUM
 21 ASSOCIATION, a California non-profit mutual
 benefit corporation; INDEPENDENT OIL
 22 PRODUCERS' AGENCY, a California
 corporation; WESTERN STATES PETROLEUM
 23 ASSOCIATION, a California non-profit mutual
 benefit corporation; and DOES 11-20,

24 Real Parties in Interest.

25 **AND CONSOLIDATED CASES**

This matter came for hearing on February 19, 2025, in the above-titled Court. All parties were represented by their counsel. Having reviewed the pleadings and having considered oral argument, and for the reasons set forth in the Court's March 6, 2025 Ruling on Petitioners' Motions for Attorneys' Fees, the Court HEREBY ORDERS as follows:

1. The Request for Judicial Notice ("RJN") of the (a) July 31, 2020 Declaration of Eric Moorman made in Opposition to both Motions for Attorneys' Fees (Exhibit 1) and (b) Judge Bradshaw's October 6, 2020 ruling on the prior Motions for Attorneys' Fees in this case (Exhibit 2), which RJN was filed by Real Parties in Interest and not opposed by any party, is GRANTED.

2. Petitioner V Lions Farming, LLC ("VLF") is entitled to attorneys' fees pursuant to Code of Civil Procedure section 1021.5 because it is a successful party in this litigation and (1) the action resulted in an enforcement of an important right affecting the public interest; (2) the action conferred a significant benefit on the general public or a large class of persons; and (3) the necessity and financial burden of private enforcement make the award appropriate.

3. The reasonable hourly rates of compensation for the work performed by VLF's attorneys and other professionals on this case are as follows:

Billers	Hourly Rate
Rachel B. Hooper (Partner/Of Counsel)	\$925
Kevin Bundy (Partner)	\$875
Susannah T. French (Of Counsel)	\$850
Tori Gibbons (Senior Associate)	\$690
Carmen Borg (Senior Planner)	\$250
Maureen Ryan (Senior Paralegal)	\$250
Julie Dolinsek (Junior Paralegal)	\$200
Law Clerks	\$200

4. VLF's motion requested a lodestar in the amount of \$2,476,315.50. The court found that some time spent by VLF during the administrative, trial court, appellate and remand phases was

1 excessive. After making deductions for excessive time, the total lodestar fee to which VLF is entitled for
2 legal work on the underlying litigation is \$1,640,000.00.

3 5. VLF requested a 1.5 lodestar multiplier, and the court found VLF is entitled to a
4 multiplier of 1.1, for a fee enhancement of \$164,000.00.

5 6. VLF is also entitled to an additional \$190,601.00 for fees incurred in connection with this
6 motion (fees-on-fees), which does not include a multiplier.

7 7. VLF is therefore awarded a total of \$1,994,601.00 in fees. Respondents and Real Parties
8 in Interest are jointly and severally liable for paying these fees.

9 8. VLF's request for \$5,360.85 for recoverable expenses in litigating this case is DENIED.

10 9. VLF filed both a memorandum of costs and a memorandum of costs on appeal on
11 October 15, 2024. Because no timely motion to strike or tax costs was filed in response to either
12 memorandum, VLF is entitled to costs as set forth in those memoranda, and the clerk shall enter those
13 costs on the judgment. (Cal. Rules of Court, Rules 3.1700(b)(4), 8.278(c).)

14
15 DATED: Signed: 4/3/2025 12:37 PM, ~~2025~~

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19 _____
20 Honorable Gregory Pulskamp
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2017 NLJ Billing Report

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Year	Firm Name	Largest U.S. Office - City	State	NLJ 500 Rank 2017	Partner Billing Rate Low	Partner Billing Rate High	Partner Billing Rate Avg	Associate Billing Rate Low	Associate Billing Rate High	Associate Billing Rate Avg	Counsel Billing Rate Low	Counsel Billing Rate High	Counsel Billing Rate Average
2017	A.O.E Law & Associates, Apc	Los Angeles	CA					\$300	\$350	\$350			
2017	Abarbanel Law Offices	Fort Lauderdale	FL							\$350*			
2017	Ackerman Fox	East Meadow	NY				\$425*	\$350	\$475	\$413			
2017	Acree Law Firm	Springfield	MO				\$275*						
2017	Adam Law Group	Jacksonville	FL				\$350			\$250			
2017	Adams, Morris & Sessing	Germantown	MD				\$365*						
2017	Adelman & Gettleman Ltd	Chicago	IL		\$395	\$525	\$465			\$325			
2017	Affinity Law Group	St. Louis	MO					\$185	\$315	\$250			
2017	Agilis Legal, PC	Denver	CO				\$350*			\$295*			
2017	Akerman LLP	Miami	FL	76			\$350*			\$275*			
2017	Albert H. Barkey, Attorney at Law	New York	NY							\$360			
2017	Allan D. Newdelman	Phoenix	AZ					\$315	\$395	\$355			
2017	Allen Barnes & Jones PLC	Phoenix	AZ		\$345	\$595	\$510	\$275	\$295	\$285			\$480
2017	Allen Turnage, P.A.	Tallahassee	FL							\$400*			
2017	Allen Vellone Wolf Helfrich & Factor P.C.	Denver	CO					\$215	\$450	\$323			
2017	Allied Legal Group Inc	Los Angeles	CA							\$250*			
2017	Almeida & Davila PSC	San Juan	PR				\$200	\$175	\$200	\$188			
2017	Andersen Law Firm, Ltd.	Las Vegas	NV							\$285			
2017	Andrew M. Ellis Law	Phoenix	AZ							\$285*			
2017	Andrews Myers PC	Houston	TX								\$325	\$375	\$350
2017	Anthony O. Egbase & Associates Attorneys At Law	Los Angeles	CA							\$150*			
2017	Antonik Law Offices	Mount Vernon	IL				\$275*						
2017	Antonio Martinez	McAllen	TX				\$250			\$175			
2017	Anyama Law Firm	Cerritos	CA				\$400	\$175	\$200	\$188			
2017	Arboleda Brechner	Phoenix	AZ				\$400*						
2017	Arlene Gordon-Oliver	White Plains	NY							\$485*			
2017	Armstrong Teasdale LLP	St. Louis	MO	181	\$370	\$660	\$590	\$225	\$285	\$250			
2017	Ast & Schmidt, P.C.	Morristown	NJ							\$395*			
2017	Atkinson Law Associates Ltd	Las Vegas	NV							\$520*			
2017	Attorney Justin Oliverio, LLC	Decatur	GA							\$275*			
2017	Attorney Robert H. Holber PC	Media	PA							\$250			
2017	Avanesian Law Firm	Glendale	CA					\$250	\$375	\$313			
2017	B. Weldon Ponder Jr.	Austin	TX							\$350*			
2017	Babcoke Law Office	Miller Beach	IN							\$350			
2017	Bach Law Offices	Northbrook	IL				\$425	\$300	\$425	\$300			
2017	Backenroth Frankel & Krinsky, LLP	New York	NY		\$505	\$550	\$528	\$485	\$550	\$505			
2017	Baker & Associates	Houston	TX				\$450	\$300	\$375	\$305	\$350	\$450	\$400
2017	Baker, Donelson, Bearman, Caldwell & Berkowitz, PC	Nashville	TN	55			\$405						
2017	Ballard Spahr LLP	Washington	DC	85	\$650	\$1,195	\$895	\$395	\$510	\$453			\$505
2017	Bankruptcy Law Center	San Diego	CA							\$425*			
2017	Barrick Switzer Long Balsley & Van Evera, LLP	Rockford	IL					\$225	\$275	\$250			
2017	Barron & Newburger, P.C.	Austin	TX				\$495			\$495			
2017	Barry Scott Miller, Esq	Newark	NJ							\$250*			
2017	Bartolone Legal Group, PA	Orlando	FL							\$325*			
2017	Bass Berry & Sims	Nashville	TN	165			\$525*			\$425*			
2017	Bast Amron LLP	Miami	FL				\$525*						
2017	Baumeister Denz LLP	Buffalo	NY		\$275	\$300	\$288			\$175			
2017	Bayard, P.A.	Wilmington	DE		\$475	\$675	\$525			\$305			
2017	Beall and Burkhardt, APC	Santa Barbara	CA		\$400	\$475	\$438			\$300*			
2017	Beard & Savory, PLLC	Memphis	TN							\$275			
2017	Behar, Gutt & Glazer, P.A.	Fort Lauderdale	FL				\$400			\$335			
2017	Belden Blaine Raytis LLP	Bakersfield	CA				\$330*						
2017	Bell, Davis & Pitt, PA	Winston-Salem	NC				\$300*						
2017	Bella Rose Skin Care PLLC	Midland	MI							\$125			
2017	Belvedere Legal, APC	San Mateo	CA				\$495*			\$395*			
2017	Benari & Nguyen LLP	Irvine	CA				\$350*			\$350*			
2017	Benjamin Brand, LLP	Chicago	IL				\$425	\$250	\$395	\$395			
2017	Bereliani Law Firm	Los Angeles	CA							\$300*			
2017	Berg Hill Greenleaf & Ruscitti, LLP	Denver	CO				\$400*						

Declaration of Peter M. K. Frost, Ex. D, Case No. 3:22-cv-03520-TLT

2017 NLJ Billing Report

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Year	Firm Name	Largest U.S. Office - City	State	NLJ 500 Rank 2017	Partner Billing Rate Low	Partner Billing Rate High	Partner Billing Rate Avg	Associate Billing Rate Low	Associate Billing Rate High	Associate Billing Rate Avg	Counsel Billing Rate Low	Counsel Billing Rate High	Counsel Billing Rate Average
2017	Berger Singerman	Miami	FL	496			\$695*						
2017	Berman DeLeve Kuchan and Chapman	Kansas City	MO				\$300			\$300			
2017	Bernstein-Burkley	Pittsburgh	PA		\$300	\$545	\$350	\$235	\$300	\$270			
2017	Bielli & Klauder, LLC	Wilmington	DE				\$325			\$205*			\$325
2017	Bigas & Bigas	Ponce	PR							\$250*			
2017	BKN Murray LLP	St. Petersburg	FL							\$375*			
2017	Black Square Financial	Coral Springs	FL							\$500*			
2017	Blake D. Gunn	Mesa	AZ					\$175	\$300	\$238			
2017	Blanchard Law, PA	Largo	FL							\$225			
2017	Blank Rome LLP	Philadelphia	PA	78	\$310	\$725	\$615	\$435	\$470	\$453			
2017	Bohnhoff & Mahoney	Lansing	MI							\$215*			
2017	Bond, Schoeneck & King, PLLC	Syracuse	NY	164	\$360	\$400	\$380						
2017	Bononi & Company, P.C.	Greensburg	PA				\$400*	\$185	\$280	\$195	\$635	\$650	\$643
2017	Bosley Till Neue & Talerico LLP	Newport Beach	CA				\$595*				\$350	\$595	\$395
2017	Boul & Associates, P.C.	Columbia	MO				\$250*			\$250*			
2017	Bracewell LLP	Houston	TX	114	\$1,000	\$1,100	\$1,050	\$550	\$755	\$653			
2017	Bradley Arant Boult Cummings LLP	Birmingham	AL	93			\$570*						
2017	Brian K. McMahon, P.A.	West Palm Beach	FL				\$400*						
2017	Broege, Neumann, Fischer & Shaver	Manasquan	NJ					\$275	\$590	\$500			
2017	Bronson Law Offices	Harrison	NY					\$275	\$400	\$375			
2017	Broussard Poche LLP	Lafayette	LA				\$220*						
2017	Brown Rudnick LLP	Boston	MA	203	\$905	\$1,245	\$1,075			\$515*			
2017	Brownstein Hyatt Farber Schreck, LLP	Denver	CO	192			\$655*			\$330*			
2017	Bruce W. Radowitz, Esq. P.A.	Union	NJ							\$300*			
2017	Bruner Wright, P.A.	Tallahassee	FL					\$225	\$350	\$288			
2017	Brutzkus Gubner Rozansky Seror Weber LLP	Woodland Hills	CA		\$235	\$850	\$625	\$325	\$500	\$485	\$495	\$675	\$573
2017	Bryan Cave LLP	St. Louis	MO	37	\$594	\$660	\$627	\$369	\$625	\$487			
2017	Bryan Diaz Law, APC	Ventura	CA							\$350*			
2017	Buddy Ford, P.A	Tampa	FL					\$300	\$375	\$338			
2017	Buechler & Garber LLC	Denver	CO				\$350						
2017	Bufete Negrón García, C.S.P	Guaynabo	PR							\$150*			
2017	Burger Law Firm	Houston	TX				\$300*	\$350	\$440	\$395			
2017	Burke, Warren, MacKay & Serritella, P.C.	Chicago	IL				\$510*			\$325*			
2017	Bush Kornfeld LLP	Seattle	WA					\$285	\$365	\$325			
2017	Byrd & Wiser	Biloxi	MS							\$300*			
2017	C Conde & Associates	San Juan	PR					\$175	\$275	\$200			
2017	Cairncross & Hempelmann	Seattle	WA							\$560*			
2017	Calaiaro Valencik	Pittsburgh	PA		\$300	\$375	\$350	\$250	\$350	\$250			
2017	Campbell and Coombs	Mesa	AZ				\$500						
2017	Canterbury Law Group	Scottsdale	AZ					\$150	\$400	\$275			
2017	Cardwell & Chang P.L.L.C	Houston	TX					\$250	\$400	\$400			
2017	Carkhuff & Radmin	North Plainfield	NJ				\$400						
2017	Carlos J Cuevas Esq	Yonkers	NY				\$450*			\$495*			
2017	Carman Law Firm	Prescott	AZ				\$250*						
2017	Carmody MacDonald PC	St. Louis	MO				\$350*						
2017	Carter Ledyard & Milburn LLP	New York	NY	458			\$900*	\$285	\$700	\$493			
2017	Catalyst Lifestyles Sport Resort, LLC	Indianapolis	IN							\$350*			
2017	CBG Law Group	Bellevue	WA				\$320*						
2017	Center City Law Offices LLC	Philadelphia	PA				\$250*						
2017	CGA Law Firm	York	PA				\$345*	\$200	\$270	\$235			
2017	Chambliss, Bahner & Stophel, P.C.	Chattanooga	TN		\$245	\$385	\$290	\$150	\$350	\$298			
2017	Charles A Curpill, PSC Law Office	San Juan	PR					\$250	\$350	\$300			
2017	Charles M Wynn Law Offices PA	Marianna	FL					\$200	\$325	\$250			
2017	Charles R. Chesnutt	Dallas	TX					\$250	\$450	\$350			
2017	Chase Bylenga Hulst, PLLC	Grand Rapids	MI				\$350*			\$275*			
2017	ChildersLaw, LLC	Gainesville	FL					\$275	\$375	\$325			
2017	Christopher C. Gautschi Attorney At Law	Santa Barbara	CA							\$400*			
2017	Ciardi Ciardi & Astin	Philadelphia	PA				\$515*	\$300	\$350	\$350			
2017	Cleary Gottlieb Steen & Hamilton LLP	New York	NY	18				\$445	\$490	\$468			

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2017	Clinton A Block Attorney At Law	Kewanee	IL							\$150*			
2017	Coats Rose	Houston	TX	362	\$475	\$650	\$563			\$325			
2017	Cohen & Krol	Chicago	IL		\$505	\$515	\$510			\$350			
2017	Cohen, Baldinger & Greenfield, LLC	Rockville	MD					\$295	\$450	\$425			
2017	Cohen Pollock Merlin & Small, P.C.	Atlanta	GA					\$305	\$385	\$345			
2017	Cole & Cole Law, P.A	Sarasota	FL					\$300	\$400	\$350			
2017	Cole Scholtz P.C.	Hackensack	NJ	330	\$495	\$915	\$658	\$280	\$445	\$305			
2017	Collins, Vella & Casello	Manasquan	NJ				\$400*			\$250*			
2017	Connolly, Rosania and Lofstedt	Louisville	CO				\$340*			\$375*			
2017	Consumer Action Law Group PC	Los Angeles	CA				\$425	\$225	\$425	\$325			
2017	Cooley LLP	Palo Alto	CA	39			\$1,100	\$595	\$835	\$735	\$850	\$1,065	\$998
2017	Coon & Cole, LLC	Towson	MD				\$350*						\$350*
2017	Cooper & Scully, P.C	Dallas	FL							\$435*			
2017	Cooper, Pautz, Weiermiller & Daubner, LLP	Horseheads	NY							\$250*			
2017	Copeland Law Firm, P.C.	Abingdon	VA							\$300			
2017	Corash & Hollender PC	Staten Island	NY				\$450*			\$425*			\$425*
2017	Cordova Ayuso Law Office LLC	San Juan	PR				\$100			\$100			
2017	Corral Tran Singh, LLP	Houston	TX		\$275	\$325	\$300						
2017	Correa Business Consulting Group, Llc	San Juan	PR							\$150*			
2017	Cozen O'Connor	Philadelphia	PA	79	\$550	\$730	\$710			\$405*			
2017	Craig & Lofton, P.C.	Memphis	TN				\$50*						
2017	Crain, Caton & James	Houston	TX				\$400*			\$325*			
2017	Crane Heyman Simon Welch & Clar	Chicago	IL		\$445	\$510	\$510			\$325*			\$400*
2017	Crowley, Liberatore, Ryan & Brogan, P.C.	Norfolk	VA							\$330*			
2017	Cunningham, Chermicoff & Warshawsky, P.C.	Harrisburg	PA				\$350						
2017	Curtis Castillo PC	Dallas	TX				\$425*	\$195	\$225	\$210			
2017	Dallas W Jolley, Jr Attorney at Law	Tacoma	WA				\$325*						
2017	Dana M. Douglas Attorney At Law	Granada Hills	CA				\$200*			\$200*			
2017	Daniel J. Rylander, P.C.	Tucson	AZ					\$200	\$300	\$250			
2017	Daniels & Taylor, PC	Lawrenceville	GA							\$300*			
2017	Dann & Merino, P.C.	East Rutherford	NJ							\$425*			
2017	Danoff & King, P.A	Towson	MD							\$350*			
2017	Danowitz & Associates, P.C.	Atlanta	GA					\$275	\$350	\$300			
2017	David C. Jones, Jr., P.C.	Fairfax	VA				\$350*						
2017	David Dunn Law Offices PC	Allentown	PA				\$300*						
2017	David E. Lynn, P.C.	Rockville	MD							\$425*			
2017	David E. Mullis, P.C.	Valdosta	GA							\$250*			
2017	David P. Lloyd, Ltd	LaGrange	IL				\$400*			\$400*			
2017	David R. Shook, Attorney at Law, PLLC	Clarkston	MI				\$350*						
2017	David R. Softness, PA	Miami	FL				\$550*						
2017	David Rosenthal Law Firm	Lafayette	IN							\$300*			
2017	David Schroeder Law Offices, PC	Springfield	MO				\$300*						
2017	David T Cain Law Offices	San Antonio	TX				\$300*						
2017	David W Steen, P.A.	Tampa	FL				\$450*	\$300	\$450	\$300			
2017	Davis Miles McGuire Gardner	Tempe	AZ				\$380*			\$240*			
2017	Davis Polk & Wardwell LLP	New York	NY	35						\$1025*			
2017	Davis, Ermis & Roberts, P.C	Arlington	TX							\$350*			
2017	Dean G. Sutton, Esq	Sparta	NJ							\$400*			
2017	Dean W. Greer, Attorney at Law	San Antonio	TX				\$300*						
2017	Deborah Lawson, Attorney At Law, P.L.L.C.	Ventura	CA							\$35*			
2017	DeCaro & Howell PC	Upper Marlboro	MD				\$425*			\$380*			
2017	Deiches & Ferschmann	Haddonfield	NJ							\$425*			
2017	DeBello Donnella Weingarten Wise & Wiederkehr LLP	White Plains	NY		\$410	\$620	\$515						\$375*
2017	DeMarco-Mitchell, PLLC	Plano	TX		\$285	\$350	\$350			\$125*			
2017	Dent Law Office, Ltd	Effingham	IL							\$300*			
2017	Dentons US LLP	Atlanta	GA		\$575	\$675	\$625			\$345*			
2017	Diamond McCarthy LLP	Houston	TX		\$420	\$750	\$585	\$320	\$340	\$330			
2017	Dibble & Miller	Rochester	NY							\$300*			
2017	Dilworth Paxson LLP	Philadelphia	PA	422	\$375	\$895	\$533	\$300	\$330	\$315			

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2017	Dishbak Law Firm	Beverly Hills	CA				\$400*						
2017	DLA Piper	New York	NY	2	\$725	\$1,120	\$985	\$265	\$850	\$595	\$720	\$805	\$775
2017	Donahoe & Young LLP	Santa Clarita	CA		\$375	\$500	\$438	\$60	\$500	\$300			
2017	Doran & Doran, P.C.	Wilkes-Barre	PA					\$285	\$300	\$293			
2017	Dorsey & Whitney LLP	Minneapolis	MN	89	\$555	\$980	\$680	\$410	\$515	\$463	\$480	\$555	\$513
2017	Dougherty and Guenther	Salinas	CA							\$395*			
2017	Douglas Haun and Heidemann, P.C.	Springfield	MO							\$250*			
2017	Drake Law Firm PLC	Scottsdale	AZ				\$300*	\$125	\$300	\$213			
2017	Drescher & Associates	Baltimore	MD							\$350*			
2017	Dsouza Law Group, P.A.	Plantation	FL							\$350*			
2017	Dunn Law, P.A.	Miami	FL				\$325*			\$325*			
2017	Durand & Associates, P.C.	Lewisville	TX				\$300*						
2017	E. P. Bud Kirk, Attorney at Law	El Paso	TX							\$300*			
2017	E. Waters & Associates, P.C.	North Bergen	NJ				\$400*			\$300			
2017	Eason & Tamborini, A Law Corporation	Sacramento	CA				\$400*	\$250	\$400	\$250			
2017	Edmiston Cambron, PLLC	Knoxville	TN				\$250*			\$250			
2017	Elizabeth A Haas Esq PLLC	New City	NY				\$400*			\$400*			
2017	Elkington Shepherd LLP	Oakland	CA							\$400			
2017	Ellett Law Offices, P.C	Phoenix	AZ					\$275	\$525	\$405			
2017	EPTMS, INC	El Paso	TX							\$300*			
2017	Eric A. Liepins	Dallas	TX							\$275*			
2017	Eric Slocum Sparks PC	Tucson	AZ					\$275	\$375	\$325			
2017	Estabrook & Company	Baltimore	MD							\$125*			
2017	Estudio Legal 1611 Corp	San Juan	PR							\$225*			
2017	Eubanks Law Firm, PC	Seymour	TN							\$250*			
2017	Fabian Law Office	San Juan	PR					\$190	\$375	\$305			
2017	Fedoroff Firm, LLC	Howell	NJ				\$350*						
2017	Financial Relief Law Center	Irvine	CA		\$325	\$300	\$313	\$295	\$350	\$300			
2017	Finestone Hayes LLP	San Francisco	CA				\$435*	\$370	\$435	\$403			
2017	Fisher and Associates	Houston	TX				\$395*	\$240	\$395	\$240			
2017	Fisher Rushmer, PA	Orlando	FL										\$475*
2017	FisherBroyles, LLP	Atlanta	GA		\$350	\$375	\$350	\$350	\$375	\$363			
2017	Flaster Greenberg	Cherry Hill	NJ		\$490	\$500	\$495						
2017	Foley & Lardner LLP	Milwaukee	WI	43			\$795*						\$630*
2017	Forrester & Worth PLLC	Phoenix	AZ				\$450*			\$400*			
2017	Forshey & Prostok, LLP	Fort Worth	TX		\$425	\$575	\$575			\$400*			
2017	Foster Law Offices	Sayrem	PA							\$250*			
2017	Foster Legal Services PLLC	Orland Park	IL							\$420*			
2017	Fox Rothschild LLP	Philadelphia	PA	49			\$725*	\$300	\$585	\$450			
2017	Francis E. Corbett, Attorney at Law	Pittsburgh	PA							\$250*			
2017	Frank A. Principe	Tampa	FL							\$300*			
2017	Frank Lyon Law Offices	Austin	TX				\$395			\$305			
2017	Franklin Hayward LLP	Dallas	TX				\$400*						
2017	Fuentes Law Offices, LLC	San Juan	PR							\$250*			
2017	Fuqua & Associates, PC	Houston	TX					\$225	\$500	\$250			
2017	Gagnon Eisele and Rigby, PLLC	Winter Park	FL				\$350*						
2017	Gainey Law Offices	Pittsburgh	PA							\$250*			
2017	Gardere Wynne Sewell LLP	Dallas	TX	194	\$640	\$725	\$640	\$280	\$385	\$360			
2017	Gardner Law Offices, PLLC	Raleigh	NC							\$275*			
2017	Garman Turner Gordon LLP	Las Vegas	NV		\$395	\$775	\$435			\$385*			
2017	Garvey Cushner & Associates PLLC	White Plains	NY				\$500			\$350*			
2017	Garvey Tirelli & Cushner Ltd	White Plains	NY				\$500			\$350*			
2017	Gary W. Short	Pittsburgh	PA					\$300	\$350	\$325*			
2017	Geiger Law LLC	Atlanta	GA							\$330*			
2017	George M. Geeslin	Atlanta	GA							\$350*			
2017	Gerald B. Stewart Attorney & Counselor at Law	Jacksonville	FL							\$300*			
2017	Gerald K. Smith and John C. Smith Law Offices	Tucson	AZ		\$250	\$600	\$350	\$350	\$250	\$350	\$300		
2017	Gerdes Law Firm, L.L.C	Hammond	LA							\$200*			
2017	Gibson, Dunn & Crutcher LLP	New York	NY	17	\$925	\$1,195	\$1,150	\$250	\$875	\$685			

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2017	Gillman & Gillman, LLC	Edison	NJ				\$350*						
2017	Giordano Halleran & Ciesla, P.C	Red Bank	NJ				\$425			\$250			
2017	Glankler Brown PLLC	Memphis	TN				\$400*						
2017	Gleichenhaus Marchese & Weishaar PC	Buffalo	NY					\$250	\$350	\$325			
2017	Goe & Forsythe LLC	Irvine	CA		\$300	\$395	\$395	\$295	\$315	\$300			
2017	Goetz Fitzpatrick	New York	NY					\$550	\$580	\$565			
2017	Gold, Lange & Majoros PC	Southfield	MI		\$325	\$395	\$340	\$230	\$260	\$235			
2017	Goldberg Weprin Finkel Goldstein LLP	New York	NY				\$550*			\$550*			
2017	Goldman & Beslow, LLC	East Orange	NJ				\$400*			\$375*			
2017	Goldsmith & Guymon, P.C.	Las Vegas	NV				\$425*			\$425*			
2017	Goldstein and McClintock	Chicago	IL		\$435	\$525				\$285*			
2017	Goldstein Bershad & Fried PC	Southfield	MI							\$400			
2017	Gonzalez Cordero Law Offices	Guaynabo	PR							\$250*			
2017	Goodman Law Offices, APC	Encino	CA				\$395*						
2017	Goodrich Postnikoff & Associates, LLP	Fort Worth	TX							\$200*			
2017	Gorski & Knowlton PC	Hamilton	NJ				\$400						
2017	Gouveia and Associates	Merrillville	IN					\$275	\$400	\$275			
2017	Grasi PLC	Farmington Hills	MI				\$350*						
2017	Gratacos Law Firm, PSC	Caguas	PR							\$200*			
2017	Gray Reed & McGraw LLP	Houston	TX	336			\$685*	\$375	\$455	\$415			\$575*
2017	Greenberg & Bass	Encino	CA				\$450*	\$350	\$400	\$400			\$495
2017	Greenberg Traurig, LLP	New York	NY	8	\$625	\$1,080	\$790	\$450	\$475	\$475			\$795
2017	Greene Infuso, LLP	Las Vegas	NV		\$325	\$450	\$388	\$225	\$450	\$338			
2017	Gregory K. Stern, P.C	Chicago	IL				\$465*	\$325	\$465	\$445			
2017	Grier Furr & Crisp, PA	Charlotte	NC		\$360	\$550	\$445	\$250	\$340	\$295			
2017	Grossbart, Portney & Rosenberg	Baltimore	MD							\$445*			
2017	Guarino Law, LLC	Montclair	NJ							\$250*			
2017	Gudeman and Associates	Royal Oak	MI				\$350*			\$300*			
2017	Guerra & Smeberg, PLLC	San Antonio	TX							\$275			
2017	Haberbush & Associates LLP	Long Beach	CA					\$90	\$450	\$225			\$175*
2017	Halabu Law Group, P.C	Birmingham	MI				\$300*						
2017	Harold M Somer PC	Westbury	NY							\$350*			
2017	Harrell & Associates	Memphis	TN							\$200*			
2017	Harris Law Practice LLC	Reno	NV							\$400*			
2017	Harriss Hartmann Law Firm PC	Rossville	GA							\$175*			
2017	Hartman & Hartman	Reno	NV							\$450*			
2017	Harvell and Collins, P.A.	Morehead City	NC					\$195	\$260	\$228			
2017	Hatillo Law Office, PSC	Bayamon	PR							\$250*			
2017	Haynes and Boone, LLP	Dallas	TX	82	\$500	\$960	\$675	\$288	\$660	\$472			
2017	Hayward, Parker, O'Leary & Pinsky	Middletown	NY				\$400*			\$400*			
2017	Heidi McLeod Law Office, PLLC	San Antonio	TX							\$300*			
2017	Heller, Draper, Patrick, Horn & Dabney, LLC	Baton Rouge	LA		\$375	\$400	\$388	\$275	\$400	\$350			
2017	Henry D Paloci III PA	Thousand Oaks	CA							\$300*			
2017	Henshaw Law Office	San Jose	CA		\$350	\$400	\$375			\$250			
2017	Herbert C. Broadfoot II, PC	Atlanta	GA					\$350	\$375	\$363			
2017	Heritage Pacific Law Group, PC	Murrieta	CA				\$250*			\$175*			
2017	Herren, Dare & Streett	St. Louis	MO				\$300*						
2017	Herron Hill Law Group, PLLC	Orlando	FL							\$300*			
2017	Hester Baker Krebs, LLC	Indianapolis	IN				\$350*	\$275	\$375	\$373			
2017	Heyboer Law PLC	Fort Gratiot	MI							\$250*			
2017	Hirschler, Fleischer	Richmond	VA				\$425*			\$250*			
2017	Hodges, Doughty & Carson PLLC	Knoxville	TN		\$250	\$325	\$288			\$200*			
2017	Hodgson Russ LLP	Buffalo	NY	206			\$360*						
2017	Hoffman & Saweris, P.C.	Houston	TX		\$235	\$335	\$285						
2017	Hoffman, Larin and Agnetti	Miami	FL							\$325*			
2017	Holly E. Estes, Esq	Reno	NV							\$350*			
2017	Homady & Corcoran, LLC	Hollidaysburg	PA							\$210*			
2017	Home Antonio Mercado Justiniano	Mayaguez	PR							\$250*			
2017	Hook & Fatovich, LLC	Wayne	NJ				\$350						

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2017	Hoover Penrod PLC	Harrisonburg	VA				\$300*			\$250*			
2017	Hoover Slovacek LLP	Houston	TX				\$475*			\$320*	\$300	\$350	\$343
2017	Horowitz Law Group, PLLC	New York	NY							\$375*			
2017	Hughes, Watters & Askanase	Houston	TX										\$350*
2017	Hunter Parker LLC	Las Vegas	NV							\$450*			
2017	Hunton & Williams LLP	Richmond	VA	61	\$625	\$775	\$730	\$350	\$535	\$515			
2017	Husch Blackwell LLP	St. Louis	MO	70			\$450*			\$315*	\$395	\$450	\$423
2017	Ice Miller LLP	Indianapolis	IN	152	\$477	\$698	\$554			\$324*			
2017	Imblum Law Offices, PC	Harrisburg	PA							\$295*			\$235*
2017	Ivey, McClellan, Gatton, & Talcott, LLP	Greensboro	NC		\$150	\$480	\$338						
2017	J.M. Cook, P.A	Raleigh	NC							\$300*			
2017	Jackson Walker LLP	Dallas	TX	124	\$545	\$750	\$695	\$465	\$515	\$490			
2017	Jake Blanchard Law, PA	Largo	FL				\$250*						
2017	James & Haugland, P.C	El Paso	TX				\$350	\$250	\$350	\$300			
2017	James F. Kahn, P.C.	Phoenix	AZ				\$400			\$250			
2017	James H. Henderson, P.C.	Charlotte	NC							\$450*			
2017	James L. Drake, Jr. P.C.	Savannah	GA					\$285	\$300	\$293			
2017	Janvier Law Firm, PLLC	Raleigh	NC					\$200	\$450	\$300			
2017	Jay Lauer, Attorney at Law	South Bend	IN							\$200*			
2017	Jay S. Kalish & Associates, P.C	Farmington	MI				\$225*						
2017	Jeffrey A. Cogan, Esq., Ltd	Las Vegas	NV							\$400*			
2017	Jeffrey C. Alandt	Traverse City	MI							\$240*			
2017	Jeffrey M Pitchford, CPA	Denver	CO							\$350*			
2017	Jeffrey Strange & Associates	Wilmette	IL				\$450*			\$395*			
2017	Jesse Blanco and Associates	San Antonio	TX							\$450*			
2017	Jimenez Vazquez & Associates, PSC	San Juan	PR							\$145*			
2017	Joel D. Russman, Attorney at Law	Denver	CO							\$395*			
2017	John A. Vos	San Rafael	CA							\$495*			
2017	John E. Dunlap, Attorney at law	Memphis	TN							\$200*			
2017	John M. Brunson, Attorney at Law	St. Petersburg	FL							\$200*			
2017	John M. McAuliffe & Associates, P.C.	Newton	MA				\$350*	\$150	\$300	\$300			\$300
2017	Johnny W. Thomas, Attorney at Law	San Antonio	TX							\$310*			
2017	Johnson & Gubler, P.C	Las Vegas	NV							\$245			
2017	Johnson Pope Bokor Ruppel & Burns, LLP	Tampa	FL		\$325	\$395	\$373						
2017	Johnston & Street	Franklin	TN							\$300*			
2017	Jones Day	Washington	DC	5	\$700	\$1,050	\$950	\$300	\$800	\$525			\$850*
2017	Jones Walker LLP	New Orleans	LA	117	\$285	\$475	\$388			\$235*			
2017	Jordan Price Wall Gray Jones & Carlton, PLLC	Raleigh	NC							\$250*			
2017	Joseph V. Meyers, Esq	Hackensack	NJ							\$350*			
2017	Joyce W. Lindauer Attorney, PLLC	Dallas	TX				\$350*	\$185	\$395	\$195			
2017	Juan C Bigas Law Office	Ponce	PR							\$250*			
2017	Justiniano's Law Office	Mayaguez	PR					\$125	\$250	\$188			
2017	Kahn & Ahart Pllc	Phoenix	AZ				\$425*	\$300	\$425	\$300			
2017	Kane Russell Coleman Logan PC	Dallas	TX	423	\$375	\$575	\$475			\$260*			
2017	Kasen & Kasen	Cherry Hill	PA		\$350	\$500	\$425			\$350*			
2017	Kasey C. Nye, Lawyer, PLLC	Tucson	AZ					\$200	\$275	\$238			
2017	Kasuri & Levy, LLC	Edison	NJ							\$425*			
2017	Kasuri Byck, LLC.	Edison	NJ							\$450*			
2017	Katz, Flatau, Popson and Boyer, LLP	Macon	GA							\$325*			
2017	Kell C. Mercer, PC	Austin	TX				\$400*						
2017	Keller & Almassian PLC	Grand Rapids	MI				\$350*			\$295*			
2017	Kelley & Clements LLP	Gainesville	GA				\$400*						
2017	Kelley and Fulton P.L.	West Palm Beach	TX				\$425*			\$425			
2017	Kelly / Warner, PLLC	Scottsdale	AZ				\$325*						
2017	Kelly G. Black, PLC	Mesa	AZ							\$300*			
2017	Kelly Hart Hallman	Fort Worth	TX	252	\$405	\$495	\$450	\$235	\$320	\$265			
2017	Kenneth H.J. Henjum, Law Offices	Ventura	CA				\$350*			\$195*			
2017	Kera & Graubard	Flushing	NY				\$450*						
2017	Kerney Law Office	Gallatin	TN							\$350*			

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2017	Khang & Khang LLP	Irvine	CA				\$350*						
2017	Kilmer Crosby & Walker PLLC	Houston	TX		\$325	\$425	\$375						
2017	King & Spalding LLP	Atlanta	GA	23	\$775	\$1,435	\$1,000	\$525	\$790	\$525			
2017	King Law Offices, P.C	Dublin	TX										\$300*
2017	Kinkead Law Offices	Amarillo	TX							\$350*			
2017	Kirkland & Ellis LLP	Chicago	IL	12	\$235	\$1,410	\$1,115	\$210	\$955	\$735			
2017	Klein & Associates, LLC	Annapolis	MD				\$275*			\$325*			
2017	Klein, Denatale, Goldner, Cooper, Rosenlieb & Kimball	Bakersfield	CA				\$315*						
2017	Klestadt Winters Jureller Southard & Stevens, LLP	New York	NY		\$575	\$675	\$625						
2017	Klug Law Firm	Okemos	MI				\$300*	\$185	\$225	\$205			
2017	Kogan Law Firm APC	Los Angeles	CA							\$300*			
2017	Koh Law Firm, LLC	Bethesda	MD							\$300*			
2017	Kornfield, Nyberg, Bendes, Kuhner & Little P.C	Oakland	CA				\$385*	\$375	\$425	\$390			
2017	Kudman Trachten Aloe LLP	New York	NY				\$550*						
2017	Kung & Associates	Las Vegas	NV				\$450						
2017	Kurt Stephen, PLLC	McAllen	TX							\$375*			
2017	Kurtzman Matera, PC	Spring Valley	NY							\$525*			
2017	Kurtzman Steady LLC	Philadelphia	PA				\$480*			\$325*			
2017	KutnerBrinen, PC	Denver	CO		\$400	\$500	\$465	\$260	\$340	\$300			
2017	Lake & Cobb PLC	Tempe	AZ					\$200	\$300	\$238			
2017	Lamberth, Cifelli, Ellis & Nason, P.A	Atlanta	GA		\$360	\$495	\$450	\$250	\$360	\$350			
2017	LaMonica Herbst & Maniscalco, LLP	Wantagh	NY				\$595			\$415			
2017	Landrau Rivera & Assoc	San Juan	PR				\$200*			\$175*			
2017	Lane & Wilkinson, LLC	Chattanooga	TN							\$250*			
2017	Langley & Banack, Inc	San Antonio	TX		\$350	\$495	\$350	\$275	\$375	\$325			
2017	Larry Vick, Attorney at Law	Houston	TX							\$375*			
2017	Latham, Shuker, Barker, Eden & Beaudine LLP	Orlando	FL							\$550*			
2017	Law at Tyson Law Firm, P.C	Greenwood	IN							\$130*			
2017	Law firm of Berger Singerman LLP	Miami	FL				\$625						
2017	Law Firm of Brian W. Hofmeister, LLC	Trenton	NJ							\$425			
2017	Law Firm of Dean W Greer	San Antonio	TX				\$300*						
2017	Law Firm Of Homel Mercado Justiniano	Mayaguez	PR							\$125*			
2017	Law Firm of Joel M. Aresty, Esq	Tierra Verde	FL							\$400*			
2017	Law Firm of Jose R Cintron	San Juan	PR							\$150*			
2017	Law Office Emily D Davila Rivera	San Juan	PR							\$200*			
2017	Law Office of Alan C Stein PC	Woodbury	NY				\$400*						
2017	Law Office of Albert G. Reese, Jr	Pittsburgh	PA							\$225*			
2017	Law Office of Aldo Caller	Overland Park	KS							\$250*			
2017	Law Office of Allen P. Turnage	Tallahassee	FL							\$300*			
2017	Law Office of Antonio I Hernandez Santiago	San Juan	PR							\$250*			
2017	Law Office of Bethany A. Ralph	Amenia	NY				\$300*			\$250*			
2017	Law Office of Carl M. Barto	Laredo	TX							\$350			
2017	Law Office of Craig D. Robins	Melville	NY					\$275	\$385	\$330			
2017	Law Office of Craig K. Welch	Petaluma	CA					\$275	\$420	\$348			
2017	Law Office of Daren M Schlechter	Los Angeles	CA							\$350*			\$275*
2017	Law Office Of David A. Scholl	Newtown Square	PA							\$300*			
2017	Law Office of David Cahn, LLC	Silver Spring	MD							\$300*			
2017	Law Office of David M. Serafin	Denver	CO							\$325*			
2017	Law Office of David W. Cohen	Baltimore	MD							\$275*			
2017	Law Office of Dick Harris, PC	Abilene	TX							\$290*			
2017	Law Office of Dino S. Mantzas	Marlton	NJ							\$300*			
2017	Law Office of Edward Gonzalez, P.C.	Washington	DC				\$450*	\$350	\$410	\$380			
2017	Law Office of Ehsanul Habib	Forest Hills	NY							\$275			
2017	Law Office of Erik G. Soderberg	Rockville	MD							\$400*			
2017	Law Office of Gary W. Cruickshank	Boston	MA							\$400			
2017	Law Office Of Gina M. Corena, Esq	Las Vegas	NV				\$400*			\$400*			
2017	Law Office of Gregory Messer PLLC	Brooklyn	NY					\$350	\$575	\$463			
2017	Law Office of H. Anthony Hervol	San Antonio	TX				\$285*			\$285*			
2017	Law Office of Harvey I. Marcus	Saddle Brook	NJ							\$350*			

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2017	Law Office Of Jackie R. Geller	San Diego	CA							\$325*			
2017	Law Office of Jacqueline E. Hernandez Santiago, Esq	San Juan	PR							\$250*			
2017	Law Office of Jeffrey L. Smoot	Seattle	WA				\$300*						
2017	Law Office of Jeffrey L. Zimring	Albany	NY							\$275*			
2017	Law Office of Jerome M. Douglas, LLC	Hawthorne	NJ				\$425	\$350	\$425	\$400			
2017	Law Office of Jonathan A. Backman	Bloomington	IL							\$325*			
2017	Law Office of Jonathan H. Stanwood, LLC	Philadelphia	PA							\$325*			
2017	Law Office Of Jonathan J. Sobel	Philadelphia	PA							\$250*			
2017	Law Office of Judith A. Descalso	Escondido	CA				\$400*			\$300*			
2017	Law Office of Kim Y. Johnson	Laurel	MD							\$205*			
2017	Law Office of Lee M. Perlman	Cherry Hill	NJ				\$350*	\$250	\$350	\$275			
2017	Law Office of Lewis R. Landau	Calabasas	CA							\$495*			
2017	Law Office of Margaret Maxwell McClure	Houston	TX				\$400*			\$400*			
2017	Law Office of Mark B. French	Bedford	TX					\$50	\$350	\$112			
2017	Law Office Of Mark J. Giunta	Phoenix	AZ				\$425*	\$175	\$225	\$200			
2017	Law Office of Mark S. Roher, P.A.	Fort Lauderdale	FL							\$300*			
2017	Law Office Of Marvin Levy	Studio City	CA							\$250*			
2017	Law Office of Michael A King	Brooklyn	NY							\$250*			
2017	Law Office of Michael J. Harker	Las Vegas	NV					\$275	\$325	\$325			
2017	Law Office Of Michael J. O'Connor	San Antonio	TX				\$300*						
2017	Law Office of Michael Y Lo	Alhambra	CA				\$475*	\$375	\$475	\$425			
2017	Law Office of Nelson M. Jones III	Houston	TX					\$250	\$375	\$312			
2017	Law Office of O. Allan Fridman	Northbrook	IL				\$425*			\$425*			
2017	Law Office of Olga Zlotnik, PLLC	Scottsdale	AZ				\$220*						
2017	Law Office of Rachel S. Blumenfeld	Brooklyn	NY							\$450			\$400*
2017	Law Office of Raquel S. White, LLC	Largo	MD							\$295*			
2017	Law Office Of Robert M Aronson	Los Angeles	CA							\$400			
2017	Law Office of Rowena N. Nelson, LLC	Largo	MD							\$325*			
2017	Law Office of Scott B. Riddle, LLC	Atlanta	GA				\$350*			\$350*			
2017	Law Office of Scott M. Hare	Pittsburgh	PA				\$400*			\$200*			
2017	Law Office of Sheila Durant	Baltimore	MD							\$375*			
2017	Law Office of Stan L Riskin P A	Aventura	FL							\$375*			
2017	Law Office of Steven M. Olson	Santa Rosa	CA					\$275	\$475	\$375			
2017	Law Office Of Thomas B. Gorrill	San Diego	CA							\$400*			
2017	Law Office of Thomas W. Lynch	Hickory Hills	IL							\$275*			
2017	Law Office of Timothy G. Niarhos	Nashville	TN					\$250	\$350	\$250			
2017	Law Office Of Timothy M. Mauser	Danvers	MA				\$420*						
2017	Law Office of Toni Campbell Parker	Memphis	TN							\$300*			
2017	Law Office of W. Derek May	Upland	CA							\$250*			
2017	Law Office of W. Thomas Bible, Jr.	Chattanooga	TN							\$250			
2017	Law Office of Warren J. Fields	Katy	TX							\$325*			
2017	Law Office of Will B. Geer, LLC	Atlanta	GA							\$325*			
2017	Law Office of William F. Kunofsky	Dallas	TX							\$350*			
2017	Law Office of William P. Fennell, APLC	San Diego	CA							\$375*			
2017	Law Office Of Yasha Rahimzadeh	Sacramento	CA							\$250*			
2017	Law Offices Lefkovitz & Lefkovitz	Nashville	TN					\$325	\$485	\$405			
2017	Law Offices of Adam Farber, P.A.	West Palm Beach	FL							\$300*			
2017	Law Offices of Alan M Lurya	Irvine	CA							\$375*			
2017	Law Offices of Alla Kachan P.C.	Brooklyn	NY							\$300*			
2017	Law Offices of Allen A. Kolber, Esq	Suffern	NY							\$450*			
2017	Law Offices of Andrew A. Moher	San Diego	CA							\$350*			
2017	Law Offices Of Andrew H. Griffin, III	El Cajon	CA					\$250	\$350	\$300			
2017	Law Offices of Anthony O Egbase & Associates	Los Angeles	CA				\$450*	\$150	\$350	\$325			
2017	Law Offices of Binder and Malter	Santa Clara	CA		\$395	\$525	\$475	\$225	\$475	\$400			
2017	Law Offices of Brooks, Frank & De La Guardia	Miami	FL				\$475*						
2017	Law Offices of Buddy D. Ford, PA	Tampa	FL				\$425	\$300	\$425	\$375			
2017	Law Offices Of C. Conde & Assoc.	San Juan	PR				\$300*			\$250*			
2017	Law Offices Of C.R. Hyde	Tucson	AZ					\$250	\$295	\$272			
2017	Law Offices of Charles B. Greene	San Jose	CA							\$495*			

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2017	Law Offices of Christopher S. Moffitt	Alexandria	VA				\$450*						
2017	Law Offices of Craig A. Diehl	Camp Hill	PA				\$250*			\$150*			
2017	Law Offices of Craig M. Geno, PLLC	Ridgeland	MS				\$375*			\$225*			
2017	Law Offices of Craig V. Winslow	San Mateo	CA				\$350*						
2017	Law Offices of David A. Tilem	Glendale	CA				\$600*	\$400	\$500	\$450			
2017	Law Offices of David A. Arietta	Walnut Creek	CA							\$350*			
2017	Law Offices of David Carlebach, Esq	New York	NY				\$450*						\$485*
2017	Law Offices of David H. Lang	Media	PA							\$300*			
2017	Law Offices Of David N. Chandler	Santa Rosa	CA					\$420	\$520	\$470			
2017	Law Offices of David W. Meadows	Los Angeles	CA							\$550*			
2017	Law Offices of Dimitri L. Karapelou, LLC	Philadelphia	PA					\$225	\$350	\$287			
2017	Law Offices of Douglas Jacobson, LLC	Cumming	GA				\$300*						
2017	Law Offices of Douglas T Tabachnik, PC	Freehold	NJ				\$500*			\$500*			
2017	Law Offices of Drew Henwood	San Jose	CA							\$250*			
2017	Law Offices Of Eric J. Gravel	San Francisco	CA							\$350*			
2017	Law Offices Of Francisco Javier Aldana Law Firm, LLP	San Diego	CA							\$450*			
2017	Law Offices of Gabriel Del Virginia	New York	NY				\$650*			\$350*			
2017	Law Offices of Gabriel Liberman, APC	Sacramento	CA				\$250*						
2017	Law Offices of George J. Paukert	Palm Desert	CA				\$200*						
2017	Law Offices Of Gold & Gold	Hatboro	PA							\$150*			
2017	Law Offices of Henry F. Sewell, Jr	Atlanta	GA				\$350*						
2017	Law Offices of Ira Benjamin Katz, A Professional Corpor	Los Angeles	CA				\$595*						
2017	Law Offices of James E Hurley Jr	New York	NY							\$400*			
2017	Law Offices of James J. Joyce PLLC	Lancaster	NY							\$250*			
2017	Law Offices Of James Yan	Pasadena	CA							\$350*			
2017	Law Offices Of Janet A. Lawson	Ventura	CA							\$350*			
2017	Law Offices of Jeffrey M Sherman	Arlington	MD							\$500*			
2017	Law Offices of Joann M. Hennessey, PL	Miami	FL							\$350*			
2017	Law Offices Of Joel Schechter	Chicago	IL				\$450*						
2017	Law Offices of John C. Hanrahan, LLC	Frederick	MD				\$300*			\$300*			
2017	Law Offices of John D. Moore, P.A.	Ridgeland	MS					\$375	\$425	\$400			
2017	Law Offices of Kevin Michael Madden PLLC	Houston	TX							\$275*			
2017	Law Offices of Konstantine Sparagis, P.C	Chicago	IL							\$250*			
2017	Law Offices of L. William Porter III	Orlando	FL				\$400*			\$400*			
2017	Law Offices of Lawrence G. Papale	Dillsburg	PA							\$300*			
2017	Law Offices Of Lawrence L. Szabo	Oakland	CA							\$450*			
2017	Law Offices of Lewis Phon	Antioch	CA				\$300*						
2017	Law Offices of Lionel E Giron	Ontario	CA				\$350*			\$350*			
2017	Law Offices of Louis J. Esbin	Stevenson Ranch	CA					\$250	\$550	\$375			
2017	Law Offices of Love & Dillenbeck, PLLC	Rural Hall	NC				\$300*						
2017	Law Offices of Marc A. Duxbury	Carlsbad	CA							\$350*			
2017	Law Offices of Marc R. Kivitz	Baltimore	MD							\$400			
2017	Law Offices of Marc Voisenat	Alameda	CA							\$400*			
2017	Law Offices of Marilyn D. Garner	Arlington	TX					\$375	\$400	\$388			
2017	Law Offices of Mark E Goodfriend	Encino	CA							\$350*			
2017	Law Offices of Mark S Martinez	Fountain Valley	CA				\$350*			\$200			
2017	Law Offices of Martha J. Simon	San Francisco	CA					\$350	\$450	\$400			
2017	Law Offices Of Marvin H. Gold	Hatboro	PA					\$250	\$500	\$400			
2017	Law Offices of Michael G. Spector	Santa Ana	CA							\$410*			\$380*
2017	Law Offices of Michael J. Henny	Pittsburgh	PA				\$300*						
2017	Law Offices of Michael Jay Berger	Beverly Hills	CA		\$495	\$525	\$510	\$265	\$495	\$373			
2017	Law Offices of Michael K. Mehr	Santa Cruz	CA							\$400*			
2017	Law Offices of Moses S. Bardavid	Encino	CA					\$275	\$350	\$313			
2017	Law Offices of Nicholas Gebelt	Whittier	CA							\$350*			
2017	Law Offices of Norman and Bullington, P.A.	Tampa	FL				\$300*						
2017	Law Offices of Oxana Kozlov	Sunnyvale	CA				\$350*						
2017	Law Offices of Paul R. Torre	Encino	CA				\$400*						
2017	Law Offices of Perez & Bonomo, LLC	Hackensack	NJ				\$475*						
2017	Law Offices of Perry Ian Tischler	Bayside	NY							\$300*			

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2017	Law Offices of Ray Battaglia, PLLC	San Antonio	TX							\$450*			
2017	Law Offices of Raymond B. Rounds	East Orange	NJ							\$150*			
2017	Law Offices of Raymond C Stilwell	Amherst	NY							\$250*			
2017	Law Offices of Raymond H Aver APC	Los Angeles	CA				\$525*			\$375*			
2017	Law Offices of Richard D. Gaines Esq.	Newton	NJ				\$350*						
2017	Law Offices of Richard F. Fellrath	Troy	MI				\$200*						
2017	Law Offices of Robert M. Yasper	Woodland Hills	CA					\$300	\$550	\$435			
2017	Law Offices of Robert N. Bassel	Clinton	MI							\$300*			
2017	Law Offices of Robert O Lampl	Pittsburgh	PA							\$275*			
2017	Law Offices of Russell King, PC	Dublin	TX							\$350*			
2017	Law Offices Of Ruth Elin Auerbach	San Francisco	CA							\$350*			
2017	Law Offices of Scott J. Sagaria	San Jose	CA				\$500*			\$450*			
2017	Law Offices Of Selwyn D. Whitehead	Oakland	CA				\$400*						
2017	Law Offices of Sheila Esmaili, Esq	Los Angeles	CA							\$300*			
2017	Law Offices of Stephen J. Kleeman	Towson	MD							\$350*			
2017	Law offices of Steven T Stanton	Maryville	IL				\$225*						
2017	Law Offices of Susan J. Cofano	Montrose	CO							\$250			
2017	Law Offices of Timothy P. Thomas, Llc	Las Vegas	NV							\$350*			
2017	Law Offices of Todd B Becker	Long Beach	CA				\$400*			\$400*			
2017	Law Offices of W. Steven Shumway	Roseville	CA							\$300*			
2017	Law Offices of William F. McLaughlin	Oakland	CA				\$350*						
2017	Law Offices of William S. Katchen, LLC	Florham Park	NJ							\$850*			
2017	Law Offices of Yvette V. Dudley, P.C	Springfield Gardens	NY							\$300*			
2017	LawCare Ltd	Greensburg	PA					\$275	\$325	\$300			
2017	Ledford, Wu & Borges, LLC	Chicago	IL		\$350	\$400	\$400			\$250*			
2017	Leech Tishman Fuscaldo & Lampl, Inc	Los Angeles	CA		\$290	\$595	\$428	\$200	\$215	\$208			\$215*
2017	Leiderman Shelomith, P.A	Fort Lauderdale	FL		\$325	\$425	\$375						
2017	Leonard, Key & Key PLLC	Wichita Falls	TX							\$300*			
2017	Leslie Cohen Law PC	Santa Monica	CA				\$575	\$297	\$390	\$350			\$390*
2017	Lesnick Prince & Pappas LLP	Los Angeles	CA		\$395	\$495	\$495			\$275*			
2017	Lester & Associates, P.C.	Garden City	NY				\$375*						
2017	Levene Neale Bender Yoo & Brill LLP	Los Angeles	CA		\$515	\$595	\$575	\$335	\$555	\$425	\$515	\$595	\$575
2017	Levitt & Stafkes, P.C.	Maplewood	NJ				\$400*						
2017	Liskow & Lewis	New Orleans	LA	324						\$200*			
2017	Litt Law Group LLC	Rockville Centre	NY										\$525*
2017	Little & Milligan, PLLC	Knoxville	TN							\$300			
2017	Lobel Weiland Golden Friedman LLP	Costa Mesa	CA		\$550	\$850	\$750						\$650*
2017	Lohr & Associates, Ltd	West Chester	PA				\$300*						\$250*
2017	Lube & Soto Law Offices PSC	San Juan	PR				\$250						
2017	Lugo Mender Group, LLC	Guaynabo	PR					\$175	\$300	\$238			
2017	Lusky and Associates	Dallas	TX							\$350*			
2017	Lyssete Morales Law Office	Mayaguez	PR					\$125	\$275	\$225			
2017	M Jones & Assoicates, PC	Santa Ana	CA		\$300	\$400	\$350	\$300	\$400	\$350			
2017	M. Denise Dotson, LLC	Atlanta	GA							\$250*			
2017	Macdonald Fernandez LLP	San Francisco	CA				\$450			\$350*			
2017	Macey, Wilensky & Hennings, LLC	Atlanta	GA		\$350	\$450	\$425	\$195	\$450	\$398			
2017	Maciag Law, LLC	Princeton	NJ					\$465	\$475	\$470			
2017	Magee Goldstein Lasky & Sayers, P.C.	Roanoke	VA				\$375*	\$200	\$275	\$238			
2017	Mahady & Mahady	Greensburg	PA							\$275*			
2017	Malaise Law Firm	San Antonio	TX				\$275*			\$275			
2017	Malone Akerly Martin PLLC	Dallas	TX				\$350*						
2017	Mansfield Law Corporation	Oxnard	CA							\$360*			
2017	Marc A. Duxbury	Murrieta	CA							\$350*			
2017	Marc A. Zaid Esq., P.C	Woodbury	PA							\$300*			
2017	Marcos D. Oliva, PC	McAllen	TX				\$250*			\$250*			
2017	Mark E. Cohen Bankruptcy Law Firm	Forest Hills	NY				\$400*						
2017	Mark M. Jones & Associates, P.C.	Santa Ana	CA					\$300	\$425	\$350			
2017	Markus Williams, Young & Zimmermann LLC	Denver	CO				\$445*			\$315*			
2017	Marshall Socarras Grant, P.L.	Boca Raton	FL							\$275*			

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2017	Martin Keith Thomas, Attorney at Law	Dallas	TX							\$400*			
2017	Maxwell Dunn, PLC	Southfield	MI		\$300	\$350	\$325			\$200*			
2017	Mayerson & Hartheimer PLLC	New York	NY				\$600			\$350*			
2017	Mazur & Brooks, A.P.L.C.	Las Vegas	NV							\$350*			
2017	McAllister Garfield, P.C.	Denver	CO		\$415	\$435	\$425	\$200	\$250	\$225	\$175	\$375	\$275
2017	McAuliffe Law Firm	Melville	NY				\$350*						
2017	McBreen & Kopko	Jericho	NY				\$400*						
2017	McBryan, LLC	Atlanta	GA							\$400*			
2017	McCallar Law Firm	Savannah	GA					\$290	\$390	\$300			
2017	McCann Garland Ridall & Burke	Pittsburgh	PA							\$350*			
2017	McCrystal Law Office	Emmaus	PA				\$275*						
2017	McCullough Eisenberg, LLC	Warminster	PA							\$350			
2017	McDonald Hopkins	Cleveland	OH	292	\$415	\$72	\$720	\$568					
2017	McDonald, Sutton & Duval, PLC	Richmond	VA					\$225	\$395	\$310			
2017	McDowell Posternock Apell & Detrick, PC	Maple Shade	NJ				\$400	\$250	\$300	\$275			
2017	McElwee Firm, PLLC	North Wilkesboro	NC							\$250*			
2017	McGuire, Craddock & Strother	Dallas	TX				\$450*						
2017	McKinley Onua & Associates PLLC	Brooklyn	NY							\$250*			\$350*
2017	McKool Smith PC	Dallas	TX	230	\$620	\$1,200	\$800	\$325	\$345	\$335			\$545*
2017	McMillan Law Group	San Diego	CA							\$375*			
2017	McNally & Busche, L.L.C.	Newton	NJ							\$350*			
2017	McNamee, Hosea, Jernigan, Kim, Greenan & Lynch, P.A.	Greenbelt	MD		\$375	\$500	\$438	\$325	\$350	\$338			
2017	McQueen & Ashman LLP	Irvine	CA		\$390	\$450	\$410				\$350	\$365	\$358
2017	McWhorter, Cobb & Johnson, LLP	Lubbock	TX							\$300			
2017	Medina Law Firm LLC	New York	NY					\$385	\$425	\$405			\$425
2017	Mellinger, Sanders & Kartzman, LLC	Morris Plains	NJ					\$335	\$395	\$365			
2017	Meridian Law	San Jose	CA							\$250*			
2017	Meridian Law, LLC	Baltimore	MD		\$300	\$325	\$313			\$250*			
2017	Merrill & Stone, LLC	Swainsboro	GA							\$285			
2017	Merrill PA	West Palm Beach	FL							\$450			
2017	Mesch Clark & Rothschild	Tucson	AZ		\$400	\$575	\$450	\$275	\$395	\$335			
2017	Messana PA	Fort Lauderdale	FL							\$350*			
2017	Mestone & Associates LLC	North Andover	MA		\$350	\$400	\$400			\$275*			
2017	Meyer, Suozzi, English & Klein, PC	Garden City	NY				\$550*						
2017	Michael A King, Attorney at Law	New York	NY							\$250*			
2017	Michael J. Davis	Denver	CO				\$350*						
2017	Michael J. Goldstein & Associates	San Francisco	CA					\$425	\$550	\$488			
2017	Michael W. Carmel, Ltd.	Phoenix	AZ							\$600*			
2017	Micheal J. Brock, Llc	Las Vegas	NV				\$250*			\$180*			
2017	Middlebrooks Shapiro, P.C.	Springfield	NJ		\$350	\$400	\$375	\$250	\$350	\$300			
2017	Millan Law Offices	San Juan	PR							\$200*			
2017	Miller & Martin PLLC	Chattanooga	TN	353			\$295						
2017	Miller and Miller, LLP	Westminster	MD							\$225*			
2017	Miller, Johnson, Snell & Cumiskey, P.L.C	Grand Rapids	MI		\$370	\$460	\$420						\$300*
2017	Mincin Law, PLLC	Las Vegas	NV				\$350*			\$360*			
2017	Minden Lawyers, LLC	Minden	NV		\$325	\$400	\$363	\$150	\$225	\$200			
2017	Minion & Sherman	West Caldwell	NJ				\$325*						
2017	Mitchell A. Sommers ESQ, P.C.	Ephrata	PA							\$225*			
2017	Moher Law Group	San Francisco	CA							\$350*			
2017	Montez & Williams PC	Waco	TX					\$225	\$350	\$288			
2017	Moon Wright & Houston, PLLC	Charlotte	NC					\$240	\$350	\$350			
2017	Moretsky Law Firm	Huntingdon Valley	PA				\$220*			\$125*			
2017	Morgan & Bley, Ltd	Chicago	IL				\$450*			\$265*			
2017	Morris, Nichols, Arshat & Tunnell LLP	Wilmington	DE	421	\$650	\$1,050	\$775	\$395	\$625	\$415			\$595*
2017	Morris, Polich & Purdy, LLP	Los Angeles	CA	472			\$575*			\$575*			
2017	Moses & Singer	New York	NY	413			\$895*						
2017	Morrison-Tenenbaum PLLC	New York	NY				\$495*			\$350			
2017	Motschenbacher & Blattner LLP	Portland	OR				\$375*	\$315	\$375	\$345			
2017	MRO Attorneys at Law, LLC	San Juan	PR							\$250*			

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2017	Ms Lozada Law Office	San Juan	PR		\$150	\$200	\$175			\$150*			
2017	Mullin Hoard & Brown, LLP	Lubbock	TX		\$275	\$420	\$348						
2017	Munsch Hardt Kopf & Harr PC	Dallas	TX	360	\$480	\$650	\$565			\$300*			
2017	Murphy Mahon Keffler & Farrier, L.L.P.	Fort Worth	TX				\$450*			\$400*			
2017	Nathan Sommers Jacobs PC	Houston	TX				\$550*			\$330*			
2017	Neeleman Law Group	Everett	WA					\$275	\$360	\$318			
2017	Neeley Law Firm Plc	Chandler	AZ							\$300*			
2017	Neff & Boyer, P.C.	Tucson	AZ					\$200	\$350	\$275			
2017	Nelson Mullins Riley & Scarborough LLP	Atlanta	GA	86	\$410	\$570	\$450	\$300	\$390	\$335			
2017	Newman & Newman, PC	Ridgeland	MS							\$300*			
2017	Niarhos & Waldron, PLC	Nashville	TN		\$250	\$350	\$300			\$250*			
2017	Nicolas A. Wong Law Offices	San Juan	PR					\$200	\$225	\$213			
2017	Noble Law Firm, P.A	Boca Raton	FL				\$300*						
2017	Noonan & Lieberman Ltd	Chicago	IL				\$150*						
2017	Norgaard O'Boyle, Attorneys At Law	Englewood	NJ		\$400	\$525	\$463	\$300	\$350	\$325			
2017	Nuti Hart LLP	Oakland	CA				\$575			\$575*			
2017	Nutovic & Associates	New York	NY				\$560*						
2017	Oaktree Law	Cerritos	CA					\$250	\$400	\$400			
2017	Obermayer Rebmann Maxwell & Hoppel LLP	Philadelphia	PA	367						\$350*			
2017	Odin, Feldman & Pittleman	Reston	VA				\$485*						
2017	Offit Kurman, PA	Bethesda	MD	308			\$440*						
2017	Okin & Adams, LLP	Houston	TX				\$425*				\$295	\$345	\$320
2017	Olshan Frome Wolosky LLP	New York	NY	431			\$730*			\$360*			
2017	Olson Nicoud & Gueck, LLP	Dallas	TX				\$400			\$400*			
2017	Onukwugha & Associates, LLC	Baltimore	MD							\$375*			
2017	Orantes Law Firm PC	Los Angeles	CA				\$500*			\$500			
2017	Orenstein Law Group	Dallas	TX				\$425*			\$225*			\$350*
2017	Ortiz & Ortiz LLP	Astoria	NY		\$400	\$450	\$425	\$325	\$350	\$325			\$325*
2017	Pachulski, Stang, Ziehl, and Jones LLP	Wilmington	DE		\$850	\$1,095	\$1,050	\$240	\$1,195	\$438			
2017	Palm Harbor Law Group	Palm Harbor	FL							\$200*			
2017	Pamela G. Magee, Attorney at Law	Baton Rouge	LA							\$325*			
2017	Pamela Jan Zylstra, A Professional Corporation	Irvine	CA							\$425*			
2017	Parker & DuFresne, P.A	Jacksonville	FL							\$300			
2017	Parker Poe Adams & Bernstein LLP	Charlotte	NC	219	\$380	\$475	\$428			\$575*			
2017	Parry Tyndall White	Chapel Hill	NC				\$325*			\$200*			
2017	Pasquale Menna, Esq	Red Bank	NJ							\$250*			
2017	Paul D. Bradford, PLLC	Cary	NC							\$350*			
2017	Paul Reece Marr, P.C.	Atlanta	GA							\$325			
2017	Paul Weiss Rifkind Wharton Garrison LLP	New York	NY	28	\$1,220	\$1,395	\$1,320	\$820	\$1,040	\$995			
2017	Penachio Malara LLP	White Plains	NY		\$325	\$450	\$388	\$325	\$400	\$363			
2017	Pendergraft & Simon LLP	Houston	TX				\$450*	\$200	\$250	\$225			
2017	Pepper Hamilton LLP	Philadelphia	PA	92	\$555	\$835	\$765	\$330	\$485	\$475			
2017	Perkins Coie LLP	Seattle	WA	31			\$695*						
2017	Phil Rhodes Law Corporation	Fair Oaks	CA				\$350*	\$300	\$350	\$325			
2017	Phillabaum Ledlin Matthews Sheldon PLLC	Spokane	WA							\$300*			
2017	Phillip K. Wallace, PLC	Mandeville	LA							\$250*			
2017	Pick & Zabicki LLP	New York	NY		\$325	\$425	\$375			\$250*			
2017	Pillar+Aught	Harrisburg	PA							\$395*			
2017	Pillsbury Winthrop Shaw Pittman LLP	Washington	DC	73	\$790	\$1,235	\$830			\$680*			
2017	Pletz and Reed, P.C.	Jefferson City	MO					\$150	\$200	\$175			
2017	Pollan Legal	Jacksonville	FL							\$200			
2017	Polsinelli PC	Kansas City	MO	51	\$400	\$625	\$513	\$260	\$360	\$310			
2017	Porter Hedges LLP	Houston	TX	383			\$485*			\$320*			
2017	Porter Law Network	Chicago	IL		\$400	\$450	\$425						
2017	Procopio, Cory, Hargreaves & Savitch LLP	San Diego	CA	255			\$525*	\$350	\$525	\$438			
2017	Pronske Goolsby & Kathman, P.C.	Dallas	TX				\$600*	\$195	\$225	\$210			
2017	Proskauer Rose LLP	New York	NY	57			\$1200*						
2017	Pulman, Cappuccio, Pullen, Benson & Jones LLP	San Antonio	TX		\$350	\$425	\$350			\$200*			
2017	Purcell Krug and Haller	Harrisburg	PA				\$300*			\$250*			

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2017	Rafool Bourne & Shelby	Peoria	IL				\$250*						
2017	Randal R Leonard Law Firm	Las Vegas	NV							\$350*			
2017	Randall S D Jacobs PLLC	New York	NY					\$300	\$600	\$450			
2017	Rattet PLLC	White Plains	NY					\$400	\$650	\$525			
2017	Rayman & Knight	Kalamazoo	MI		\$250	\$325	\$293						
2017	Redman Ludwig PC	Indianapolis	IN				\$250*						
2017	Reed Smith, LLP	New York	NY	15	\$820	\$902	\$880	\$425	\$675	\$528			
2017	Reganyan Law Firm	Glendale	CA							\$300*			
2017	Renan Buendia Hinojosa	Annandale	VA							\$400*			
2017	Reynolds Law Corporation	Davis	CA				\$350*						
2017	Richard L Hirsh, P.C.	Lisle	IL					\$75	\$400	\$238			
2017	Richard S. Feinsilver, Esq.	Carle Place	NY				\$350*						
2017	Richard W. Martinez, APLC	New Orleans	LA				\$350*						
2017	Richards, Layton & Finger, P.A	Wilmington	DE	256	\$250	\$850	\$738	\$295	\$465	\$360			
2017	Rick L. Sponaugle CPA LLC	Denver	CO							\$125*			
2017	Riggi Law Firm	Las Vegas	NV				\$400*	\$195	\$400	\$298			
2017	Riley & Dever, P.C.	Lynnfield	MA					\$50	\$350	\$200			
2017	Ritter Spencer PLLC	Addison	TX							\$350*			
2017	Rivera-Velez & Santiago LLC	San Juan	PR					\$75	\$200	\$150			
2017	Roach, Leite & Manyin, LLC	Philadelphia	PA				\$250*						
2017	Robert A Angueira, PA	Miami	FL					\$260	\$450	\$355			
2017	Robert Altman, PA	Palatka	FL							\$400*			
2017	Robert C. Bruner, Attorney at Law	Tallahassee	FL							\$350			
2017	Robert O Lampl Law Office	Pittsburgh	PA					\$350	\$450	\$388			
2017	Robinson, Bradshaw & Hinson, P.A.	Charlotte	NC	320	\$330	\$565	\$425	\$175	\$565	\$310			
2017	Robl Law Group LLC	Tucker	GA				\$350*	\$250	\$350	\$300	\$250	\$300	\$275
2017	Rodriguez & Asociados	Vega Baja	PR					\$175	\$250	\$213			
2017	Rogers Law Offices	Atlanta	GA				\$350*			\$295*			
2017	Ronald D. Weiss, PC	Melville	NY							\$350*			
2017	Rosen, Kantrow & Dillon, PLLC	Huntington	NY							\$425*			
2017	Rosenberg Musso & Weiner LLP	Brooklyn	NY				\$625*			\$575*			
2017	Rosenstein & Associates	Temecula	CA				\$375*						
2017	Rosenthal, Levy, Simon & Ryles	West Palm Beach	FL										\$400*
2017	Rounds & Sutter, LLP	Ventura	CA				\$350			\$275*			
2017	Roussos, Lassiter, Glanzer & Barnhart	Norfolk	VA		\$325	\$390	\$358						
2017	Ruben Gonzalez	Bayamon	PR							\$250*			
2017	Rubin and Rubin, P.A.	Jacksonville	FL				\$575						
2017	Ruddy, King & Petersen Law Group, LLC	Aurora	IL		\$270	\$280	\$275						
2017	Rudov & Stein P.C.	Pittsburgh	PA				\$400*			\$185*			\$280*
2017	Ruff and Cohen	Gainesville	FL							\$300*			
2017	Ruta Soulios Stratis LLP	New York	NY				\$440*						
2017	Sabaratnam and Associates	Oakland	CA				\$280*			\$360*			
2017	Sandground, West, Silek & Raminpour, PLC	Vienna	VA				\$350*						
2017	Santiago & Gonzalez Law	Yauco	PR				\$200*			\$125*			
2017	Santos Berrios Law Offices LLC	Humacao	PR					\$150	\$200	\$175			
2017	Sasser Law Firm	Cary	NC				\$300*			\$290*			
2017	Saul Ewing LLP	Philadelphia	PA	171	\$695	\$780	\$710			\$395*			
2017	Scarborough & Fulton	Chattanooga	TN							\$375*			
2017	Scaringi & Scaringi, PC	Harrisburg	PA				\$275			\$175*			
2017	Schachter Harris LLP	Dallas	TX					\$160	\$300	\$210			
2017	Schafer and Weiner, PLLC	Bloomfield Hills	MI		\$310	\$465	\$373	\$245	\$295	\$275			
2017	Scheef & Stone, LLP	Frisco	TX		\$400	\$450	\$400			\$300*			
2017	Schian Walker, P.L.C	Phoenix	AZ				\$560*			\$220*			
2017	Schneider & Onofry, P.C.	Phoenix	AZ				\$385*						
2017	Schneider & Stone	Skokie	IL							\$350*			
2017	Schneider Miller, P.C	Detroit	MI					\$175	\$390	\$270			
2017	Schwartz & Shaw LLC	Bethlehem	PA							\$300*			
2017	Scott E. Kaplan, LLC	Allentown	NJ					\$250	\$300	\$275			
2017	Scura, Wigfield, Heyer, Stevens & Cammarota, LLP	Wayne	NJ				\$425	\$350	\$425	\$375			

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2017	Seabrook Law Offices	San Jose	CA				\$300*						
2017	Serratelli, Schiffman, & Brown P.C	Harrisburg	PA				\$300*			\$250*			
2017	Severaid & Glahn, Pc	Sacramento	CA				\$375*						
2017	Sferrazza & Keenan PLLC	Melville	NY				\$300*						
2017	SFS Law Group	Charlotte	NC				\$400*						
2017	Shafferman & Feldman, LLP	New York	NY					\$325	\$360	\$343			
2017	Shapiro, Croland, Reiser, Apfel & Di Iorio, LLP	North Haledon	NJ							\$375			
2017	ShapiroSchwartz LLP	Houston	TX							\$375*			
2017	Sheehan Law Firm, PLLC	Ocean Springs	MS				\$300*						
2017	Sheils Winnubst PC	Richardson	TX					\$225	\$350	\$288			
2017	Sheppard, Mullin, Richter & Hampton LLP	Los Angeles	CA	64			\$760*	\$585	\$630	\$608			
2017	Sherman Silverstein Kohl Rose & Podolsky	Moorestown	NJ		\$415	\$650	\$533						
2017	Shevitz Law Firm	Los Angeles	CA							\$350*			
2017	Shipkevich PLLC	New York	NY				\$500*			\$350*			\$500*
2017	Shraiberg, Landau & Page, P.A.	Boca Raton	FL		\$375	\$500	\$438			\$325*			
2017	Shulman Hodges & Bastian LLP	Irvine	CA		\$395	\$575	\$550	\$275	\$425	\$350	\$425	\$650	\$513
2017	Sichenzia Ross Friedman Ference LLP	New York	NY				\$575*						
2017	Sidley Austin LLP	Chicago	IL	10	\$965	\$1,180	\$1,135						
2017	Siegel & Siegel, P.C.	New York	NY				\$400*						
2017	Sills Cummis & Gross P.C.	Newark	NJ	311	\$695	\$775	\$735			\$495*			\$525*
2017	Simbro & Stanley, PLC	Scottsdale	AZ							\$500*			
2017	Simon Resnik Hayes LLP	Sherman Oaks	CA		\$385	\$425	\$405			\$350			\$485
2017	Simpson Thacher & Bartlett LLP	New York	NY	27	\$1,340	\$1,360	\$1,350	\$740	\$1,080	\$900	\$1,115	\$1,170	\$1,143
2017	Slipakoff & Slomka, PC	Atlanta	GA							\$300*			
2017	Smaha Law Group, APC	San Diego	CA				\$425*			\$285			
2017	Smith Conerly LLP	Carrollton	GA				\$325*			\$270*			
2017	Snow Spence Green LLP	Houston	TX					\$500	\$650	\$575			
2017	Southwell & O'Rourke P.S.	Spokane	WA					\$300	\$400	\$350			
2017	Speckman & Associates	San Diego	CA				\$250*						
2017	Spector and Johnson	Dallas	TX		\$325	\$350	\$338						
2017	Spence Custer Saylor Wolfe & Rose, LLC	Johnstown	PA				\$250*			\$250			
2017	Spence Law Office, P.C.	Jericho	NY				\$450*						
2017	Spigner & Associates, PC	Plano	TX				\$450*			\$200*			
2017	Springer Brown, LLC	Wheaton	IL				\$405*	\$315	\$375	\$350			
2017	St. James Law, P.C.	San Francisco	CA				\$595*						
2017	Stan L. Riskin, P.A.	Plantation	FL							\$375*			
2017	Stanley A Kirshenbaum, Attorney at Law	Pittsburgh	PA							\$250*			
2017	Starr & Starr, PLLC	New York	NY				\$400*	\$90	\$380	\$235			
2017	Steidl & Steinberg	Pittsburgh	PA				\$300*						
2017	Steinberg & Associates Esqs	Kew Gardens	NY				\$450*						
2017	Steinberg Nutter & Brent	Calabasas	CA				\$450*			\$250*			
2017	Stephen C. Hinze, Counselor At Law	Vista	CA				\$275*						
2017	Steven L. Yarmy, Esq.	Las Vegas	NV							\$450*			
2017	Steven M. Fishman P.A.	Clearwater	FL							\$300*			
2017	Steven R Fox Law Offices	Encino	CA				\$450*						
2017	Steven T. Mulligan	Denver	CO					\$236	\$325	\$293			
2017	Stevenson & Bullock, P.L.C	Southfield	MI		\$275	\$375	\$325	\$275	\$300	\$300			
2017	Stewart McArdle & Sorice, LLC	Greensburg	PA				\$225*						
2017	Stewart Robbins & Brown, LLC	Baton Rouge	LA		\$285	\$370	\$360						
2017	Stichter, Riedel, Blain & Postler, P.A.	Tampa	FL				\$350*			\$225*			
2017	Stillman & Associates, P.C.	Miami Beach	FL							\$500*			
2017	Stone and Baxter, LLP	Macon	GA							\$135*			
2017	Strawn & Edwards, PLLC	Dyersburg	TN							\$285*			
2017	SulmeyerKupetz	Los Angeles	CA		\$550	\$800	\$595	\$175	\$550	\$475	\$525	\$560	\$525
2017	Suzy Tate, P.A.	Tampa	FL		\$300	\$325	\$313			\$260*			
2017	Tang & Associates, P.C.	Los Angeles	CA				\$325*	\$250	\$400	\$325			
2017	Tarbox Law, P.C.	Lubbock	TX							\$300*			
2017	Tarpy, Cox, Fleishman & Leveille, PLLC	Knoxville	TN					\$200	\$300	\$275			
2017	Tarter Krinsky & Drogin	New York	NY				\$590*						

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2017	Tavenner & Beran, PLC	Richmond	VA		\$405	\$415	\$410			\$235*			
2017	Thaler Law Firm PLLC	Westbury	NY				\$500*						
2017	The Ballstaedt Law Firm	Las Vegas	NV							\$300			
2017	The Bankruptcy Group, P.C	Roseville	CA					\$200	\$400	\$200			
2017	The Batista Law Group, PSC	San Juan	PR					\$75	\$225	\$150			
2017	The Burns Law Firm, LLC	Greenbelt	MD				\$495*			\$355*			
2017	The Callins Law Firm, LLC	Atlanta	GA				\$215*						
2017	The Cowart Law Firm, PC	Madison	GA				\$250*						
2017	The Coyle Law Group LLC	Columbia	MD				\$400*						
2017	The De Leo Law Firm, LLC	Mandeville	LA							\$300*			
2017	The DeLorenzo Law Firm	Schenectady	NY										\$350*
2017	The Derbes Law Firm, L.L.C.	Metairie	LA		\$300	\$375	\$350	\$160	\$200	\$180			\$275*
2017	The Dorf Law Firm LLP	Mamaroneck	NY				\$495*			\$375*			\$850*
2017	The Dragich Law Firm PLLC	Grosse Pointe Woods	MI				\$375*			\$250*			
2017	The Dribusch Law Firm	East Greenbush	NY							\$300*			
2017	The Feldman Law Group	San Diego	CA							\$375*			
2017	The Fuller Law Firm, PC	San Jose	CA		\$395	\$505	\$475						
2017	The Furnier Muzzo Group, Llc	Las Vegas	NV							\$300*			
2017	The Guard Law Group, PLLC	Lakeland	FL							\$300*			
2017	The Harvey Law Firm	Dallas	TX				\$400*						
2017	The Kelly Firm, PC	Spring Lake	NJ				\$400			\$275			
2017	The Law Firm Of Ann Shaw, P.A.	Salisbury	MD							\$345*			
2017	The Law Firm of Florida Bankruptcy Advisors, P.L.	Fort Lauderdale	FL				\$300*						
2017	The Law Office of Barry S. Miller	Newark	NJ							\$350*			
2017	The Law Office Of Corey B. Beck, P.C.	Las Vegas	NV							\$375*			
2017	The Law Office of David F. Mills	Smithfield	NC					\$150	\$250	\$200			
2017	The Law Office of Jay Meyers	Staten Island	NY							\$450*			
2017	The Law Office of Robert Eckard and Associates, PA	Palm Harbor	FL							\$250*			
2017	The Law Office of William J. Factor, Ltd	Northbrook	IL		\$275	\$375	\$325						
2017	The Law Offices of Eric N. McKay	Jacksonville Beach	FL				\$350*						
2017	The Law Offices Of Hector Eduardo Pedrosa Luna	San Juan	PR							\$175*			
2017	The Law Offices of Jason A. Burgess, LLC	Atlantic Beach	FL		\$295	\$300	\$295	\$195	\$300	\$248			
2017	The Law Offices of Jeffrey L. Weinstein	New York	NY							\$500*			
2017	The Law Offices of Oliver & Cheek, PLLC	New Bern	NC				\$175*						
2017	The Law Offices of Richard B. Rosenblatt	Rockville	MD					\$295	\$300	\$350			
2017	The Law Offices of Robert M. Fox, Esq.	New York	NY					\$275	\$375	\$325			
2017	The Law Offices of Robert S. Lewis P.C	Nyack	NY							\$400*			
2017	The Law Offices of Stephen R Wade	Claremont	CA		\$125	\$415	\$270			\$250*			
2017	The Law Office of Tuella O. Sykes	Seattle	WA							\$310*			
2017	The Lewis Law Group, P.C.	Arlington	VA							\$350*			
2017	The Milledge Law Firm, PLLC	Houston	TX							\$350*			
2017	The Mitchell Law Firm, L.P	Dallas	TX		\$325	\$375	\$325			\$225			
2017	The Perez Law Firm	Corpus Christi	TX				\$250*			\$150*			
2017	The Phillips Law Offices, LLC	Saugus	MA				\$300*						
2017	The Pope Firm	Johnson City	TN							\$250*			
2017	The Pope Law Firm	Houston	TX				\$300*			\$300*			
2017	The Schofield Law Firm, P.C.	Brunswick	GA							\$225*			
2017	The Shinbrot Firm	Beverly Hills	CA					\$465	\$525	\$495			
2017	The Spears & Robl Law Firm, LLC	Decatur	GA				\$350*			\$350*			
2017	The Tracy Firm, Ltd	Chicago	IL							\$350*			\$350*
2017	The Turoci Firm	Riverside	CA					\$275	\$500	\$400			
2017	The Vida Law Firm, PLLC	Bedford	TX							\$350*			
2017	The Wiley Law Group, PLLC	Dallas	TX							\$375*			
2017	The Wright Law Office, PC	Decatur	GA							\$285*			
2017	Thomas B. Woodward, Attorney at Law	Tallahassee	FL				\$400*						
2017	Thomas E. Crowe, Professional Law Corporation	Las Vegas	NV				\$425*						
2017	Thomas F. Quinn, PC	Denver	CO				\$250*						
2017	Thomas J. Dwyer & Associates, LLC	New York	NY				\$350*						
2017	Thompson & Knight LLP	Dallas	TX	162			\$695*						

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2017	Thompson Burton PLLC	Franklin	TN				\$395	\$225	\$395	\$310			
2017	Thompson Law Group, P.C.	Pittsburgh	PA							\$250*			
2017	Timothy W Gensmer, PA	Sarasota	FL							\$300*			
2017	Togut, Segal & Segal	New York	NY		\$875	\$990	\$933						
2017	Totaro & Shanahan	Pacific Palisades	CA					\$500	\$550	\$525			
2017	Trenk, DiPasquale, Della Fera & Sodono, P.C.	West Orange	NJ		\$245	\$580	\$563	\$240	\$615	\$275			
2017	Trodella & Lapping LLP	San Francisco	CA				\$500*						
2017	Tsao-Wu and Yee, LLP	San Jose	CA							\$300*			
2017	Tucker Hester Baker & Krebs, LLC	Indianapolis	IN				\$350*			\$350*			
2017	Tully Rinckey PLLC	Albany	NY				\$350*			\$180*			
2017	Tyler S. Van Voorhees Law, LLC	Clermont	FL							\$250*			
2017	Underwood, Perkins and Ralston	Dallas	TX					\$225	\$450	\$338			
2017	Van Dam Law LLP	Newton	MA							\$350*			
2017	Van Horn Law Group, PA	Fort Lauderdale	FL				\$400*	\$350	\$400	\$350			
2017	Villeda Law Group	McAllen	TX					\$250	\$375	\$313			
2017	Vincent D. Commisa, Esq.	Warren	NJ							\$350*			
2017	Vogel Bach & Horn, P.C.	New York	NY				\$225*						
2017	Vokshori Law Group	Los Angeles	CA							\$300*			
2017	Vorndran Shilliday PC	Denver	CO							\$300*			
2017	Vortman & Feinstein	Seattle	WA				\$425*			\$310*			
2017	Wadsworth Warner Conrardy, P.C.	Denver	CO		\$285	\$400	\$300			\$200*			
2017	Walsh, Becker, Wood & Rice	Bowie	MD				\$300*						
2017	Warner Norcross & Judd LLP	Grand Rapids	MI	182	\$410	\$555	\$518	\$285	\$345	\$315			\$550*
2017	Warshaw Burstein, LLP	New York	NY		\$175	\$375	\$275			\$275*			
2017	Wasserman, Jurista & Stolz, P.C.	Basking Ridge	NJ		\$375	\$675	\$450				\$500	\$550	\$525
2017	Wauson Probus	Sugar Land	TX				\$450*	\$250	\$450	\$400			
2017	Wayne Greenwald, P.C.	New York	NY				\$600*			\$550*			
2017	Weinberg Zareh & Geyerhahn, LLP	New York	NY				\$575			\$325*			
2017	Weinman & Associates, PC	Denver	CO				\$475*			\$475*			
2017	Weintraub & Selth APC	Los Angeles	CA		\$495	\$550	\$523	\$395	\$550	\$430			\$435*
2017	Weiss & Spees, LLP	Los Angeles	CA		\$350	\$500	\$500						
2017	Weissberg & Associates, Ltd	Chicago	IL				\$450*						
2017	Wells And Jarvis, P.S	Seattle	WA							\$360*			
2017	Weycer, Kaplan, Pulaski & Zuber, P.C.	Arlington	TX				\$385*			\$195*			
2017	White & Wolnerman, PLLC	New York	NY					\$250	\$400	\$400			
2017	Whiteford, Taylor & Preston	Baltimore	MD	265	\$530	\$570	\$550			\$340*			
2017	Whitelaw & Fangio	Syracuse	NY				\$225*						
2017	Wilcox Law Firm	Ponte Vedra Beach	FL				\$325*						
2017	William E. Jamison Jr., Attorney at Law	Chicago	IL							\$350*			
2017	William E. Maddox Jr., L.L.C.	Knoxville	TN							\$200*			
2017	William F. Davis & Associates, PC	Albuquerque	NM				\$475*	\$225	\$250	\$238			
2017	William H. Brownstein & Associates, Professional Corpo	Santa Monica	CA				\$525*						
2017	Willis & Wilkins, LLP	San Antonio	TX				\$375*						
2017	Willkie Farr & Gallagher LLP	New York	NY	74	\$1,150	\$1,425	\$1,350	\$625	\$965	\$800			
2017	Wilson, Harrell, Farrington	Pensacola	FL							\$150*			
2017	Winegarden Haley Lindholm & Robertson PLC	Grand Blanc	MI				\$225*						
2017	Winstead PC	Dallas	TX	130	\$550	\$625	\$588	\$335	\$450	\$375			
2017	Winston & Cashatt, Lawyers	Spokane	WA							\$280*			
2017	Winston & Strawn LLP	Chicago	IL	46			\$930*	\$560	\$750	\$655			
2017	Winthrop Couchot Golubow Hollander, LLP	Newport Beach	CA		\$595	\$750	\$595			\$425*			\$750
2017	Wiss & Freemyer, LLP	Dallas	TX							\$375*			
2017	Wollmuth Maher & Deutsch LLP	New York	NY		\$695	\$795	\$695			\$595*			
2017	Womac Law	Houston	TX							\$225*			
2017	Womble Carlyle Sandridge & Rice, LLP	Winston-Salem	NC	97			\$525*	\$350	\$400	\$375			\$450
2017	Woods Rogers PLC	Roanoke	VA				\$355*	\$185	\$200	\$193			
2017	Wright Law Offices	Phoenix	AZ							\$300*			
2017	Wyatt & Mirabella PC	The Woodlands	TX				\$600*			\$600*			
2017	Young Conaway Stargatt & Taylor, LLP	Wilmington	DE	408	\$520	\$890	\$805	\$285	\$540	\$430			
2017	Yumkas, Vidmar, Sweeney & Mulrenin, LLC	Columbia	MD		\$295	\$420	\$358						

Declaration of Peter M. K. Frost, Ex. D, Case No. 3:22-cv-03520-TLT

2017 NLJ Billing Report

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Year	Firm Name	Largest U.S. Office - City	State	NLJ 500 Rank 2017	Partner Billing Rate Low	Partner Billing Rate High	Partner Billing Rate Avg	Associate Billing Rate Low	Associate Billing Rate High	Associate Billing Rate Avg	Counsel Billing Rate Low	Counsel Billing Rate High	Counsel Billing Rate Average
2017	Zack A. Clement PLLC	Houston	TX							\$600*			
2017	Zalkin Revell, PLLC	Santa Rosa Beach	FL				\$300*	\$265	\$300	\$300			
2017	Zolkin Talerico LLP	Los Angeles	CA				\$495*						
2017	Zousmer Law Group PLC	Bloomfield Hills	MI				\$395						
	* Not an average - represents one rate/one position.												

	Actual	Omit	Total Costs
Court Fees			
6/17/22 USDC-NDCA Pro Hac Vice fee, S. Ince-Johannsen	317.00		317.00
6/30/22 USDC-NDCA Pro Hac Vice fee, P. Frost	317.00		317.00
Total Court Fees	\$ 634.00	\$ -	\$ 634.00
Reproduction and Printing			
11/19/21 FedEx, Eugene: Printing and laminating	6.18	6.18	-
2/25/22 Eugene Copier Log: 4 x \$.60 Color, 20 x \$.20 B&W	6.40	6.40	-
6/25/22 Eugene Copier Log: 131 x \$.20 B&W	26.20	26.20	-
7/25/22 Eugene Copier Log: 104 x \$.20 B&W	20.80	20.80	-
2/25/23 Eugene Copier Log: 138 x \$.60 Color	82.80	82.80	-
5/25/23 Eugene Copier Log: 12 x \$.60 Color	7.20	7.20	-
10/25/23 Eugene Copier Log: 38 x \$.60 Color, 9 x \$.20 B&W	24.60	24.60	-
6/17/24 FedEx, Eugene: Printing fees	23.24	23.24	-
Total Reproduction and Printing	\$ 197.42	\$ 197.42	\$ -
Postage & Delivery			
2/24/22 USPS Eugene: Postage for mailing of 4 certified notices	27.84		27.84
6/22/22 USPS Eugene: postage for mailing of 5 service packets	35.80		35.80
7/26/24 USPS: briefs mailed to clients	39.40	39.40	-
12/17/24 FedEx: postage for items to clients before meeting	9.75		9.75
Total Postage & Delivery	\$ 112.79	\$ 39.40	\$ 73.39
Travel, Lodging, & Meals			
5/23/23 United Airlines, P. Frost, flight EUG-SFO for hearing	390.80		390.80
5/31/23 BEI San Francisco by Wyndham, 2 nights lodging, P. Frost for court hearing	452.69		452.69
6/25/23 Taxi to airport, Eugene, P. Frost	37.00		37.00
6/25/23 United Airlines, P. Frost, bag fee	35.00		35.00
6/25/23 San Francisco, BART ticket, P. Frost	24.00		24.00
6/27/23 United Airlines, P. Frost, bag fee	35.00		35.00
Total Travel, Lodging, & Meals	\$ 974.49	\$ -	\$ 974.49
Total Case Expenses	\$ 1,918.70	\$ 236.82	\$ 1,681.88